### FACT SHEET

FAC	ILITY NAME: <u>Houston Light &amp; Pwr - TH Wharton</u> LOCATION: <u>Houston</u> , Tx.
EPA	I.D. NUMBER: TXD000837351
Α.	FACILITY INFORMATION
Sho	rt description of facility: Container storage; tank storage; surface impound-
_me	nt; tank treatment. Electric services.
Cur	rent status: Operating Closing X Post-Closure Not Subject : Waiver
В.	GROUNDWATER VIOLATION DATA:
	Date of Groundwater Violation: (Violation on Dingell Sheets'
	Description of Violation:
С.	ENFORCEMENT ACTIONS
	Informal Enforcement Action Taken: Yes(if Yes, describe below) No
	Type of Informal Action: Date:
	Response Due Date: Actual Compliance Date:
	Number days from inspection finding violation to informal enforcement
	Formal Enforcement Due by: (timely and appropriate criteria)
	Formal Enforcement Action Taken: Yes (if Yes, describe below) No
	Type of Formal Action: Date:
	Responsible Agency: State EPA
	Scheduled Compliance Date: Actual Compliance Date:
	Number days from inspection finding violation to formal enforcement
31636	Returned to compliance without enforcement: Yes (if Yes, Date:)

٥.	History (October 1, 1984 - January 31, 1986)
	Violation: No Class I Violations Date: 06-16-85 CEI
	Description of Violation:
	Informal Enforcement Action Taken: Yes (If Yes, describe below) No
	Type of Informal Action: Date: Date:
	Response Due Date: Actual Compliance Date
	Number days from inspection finding violation to informal enforcement
	Formal Enforcement Due by: (timely and appropriate criteria)
	Formal Enforcement Action Taken: Yes (If Yes, describe below) No
	Type of Formal Action: Date:
	Responsible Agency: StateEPA
	Scheduled Compliance Date: Actual Compliance Date:
	Number days from inspection finding violation to formal enforcement
	Returned to compliance without enforcement: Yes (if Yes, Date)
	Violation: No Violations Date: 10-29-85 Closure Insp.
	Description of Violation:
	Informal Enforcement Action Taken: Yes (if Yes, describe below) No
	Type of Informal Action Date:
	Response Due Date: Actual Compliance Date:
	Scheduled Compliance Date: Actual Compliance Date:
	Number days from inspection finding violation to informal enforcement
	Formal Enforcement Due by: (timely and appropriate criteria)
	Formal Enforcement Action Taken: Yes (if Yes, describe below) No
	Type of Formal Action: Date:
	Responsible Agency: State EPA
	Scheduled Compliance Date:  Number days from inspection finding violation to formal enforcement
	Returned to compliance without enforcment: Yes (if Yes. Date:

Ε.	Lois of Interim Status (LOIS)
	Facility Certified: Groundwater: Yes No $\frac{X}{X}$ Not Subject
	Submitted Part B: Yes No
	Submitted Closure Plan: YesX No
	EPA LOIS Inspection: Yes X (if Yes, Date: 05-01-86)
	LOIS Violation Discovered: Yes (If Yes, describe below:
	No
	Enforcement: Yes (if Yes, check reason)
	For Groundwater:
	For Financial:
	For Closure:
	Operating In Violation:
	Date Enforcement Taken by EPA:
	Anticipated Enforcement to be taken: Yes No v

### ATTACHMENT III

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### LOSS OF INTERIM STATUS REGION VI EPA RO6-01-06

1.	Reviewer:	DGS /SAF					
2.	Facility name:	HOUSTON LIC	THT!	MaF	PINE	2 -	-WHARTON GEN.
3.	Address/location:	P.O. BOX I	J	.)			
		HOUSTON,	Τχ.	7700	21		
4.	EPA I.D. No.:	TXD OOD ?	37	351			
5.	Type of RCRA units	= 7450				TD	WR# 31636
	requiring certific	ation: CLEANING ORGANIC	c				
*	A. S.T ACIDS CO		н.				
X	B. S.I COLLEC		ī.				
	C		J.				
	D		Κ.				
	E		L.				
	F		М.				
	G		N.				
	* Q.ZZ			¥	Yes	No	Not Determined
6.	Is groundwater cer required? If yes, Question 7. If no 22.	continue to				Ø	
7.	Is financial assurtion required? If to Question 3. If Question 22.	yes, continue		ø		Ø	

		Yes	Ио	Determined
S	Was groundwater certification submitted? If yes, continue to Question 9. If no, answer Questions 9, 10, 11, and 12, and go to Question 20.	. 🛚		
s 1	Was financial assurance certification submitted? If yes, continue to Question 10. If no, answer Questions 10, 11, and 12 and yo to Question 20.	_		
ā	Is signature adequate? If yes, continue to Question 11. If no, answer Questions 11 and 12 and go to Question 22.			
6	Documentation available?  a. Part A Submittal - Date:	N N Receive		
į	Do all documents listed in Question ll agree with the information shown in Question 5? If yes, continue to Question 13. If no, go to Question 22 and check with Project Manager before continuing with questionnaire.	_		
Ċ	Does groundwater certification properly address all units listed in Question 5? If yes, continue to Question 14.			

				Yes	No	Determin	ed
14.	(ins prop Ques	financial assurance certification urance and closure/post-closure) erly address all units listed in tion 5? If yes, continue to tion 15. If no, go to Question 22		Ø Q.	_ 7Z	0	
15.	and cont	insurance address both sudden non-sudden occurrences? If yes, inue to Question 16. If no, o Question 22.		Ø			A 1.11
16.	used assu chec meth	th of the following options were to demonstrate financial rance for closure? Note: k yes for the appropriate od - it is not necessary to k No for those which do not y.	Closure Cost	<u> </u>	10/22/2	rt B	Available
		Closure trust fund: Surety bond guaranteeing					
		payment into a closure trust fund:					
		Surety bond guaranteeing performance:					
	d.	Closure letter of credit: Closure insurance:					
		Financial test/corporate	49				
		guarantee: Multiple financial		Ø2-22-23	-		
		mechanisms:	- 0				Available
17.	used assu Note ate to c	th of the following options were to demonstrate financial trance for post-closure?  : Check yes for the approprimethod - it is not necessary theck no for those which do apply.	POST CLO COST	SUPE —		LASURANCE	WALLAGE

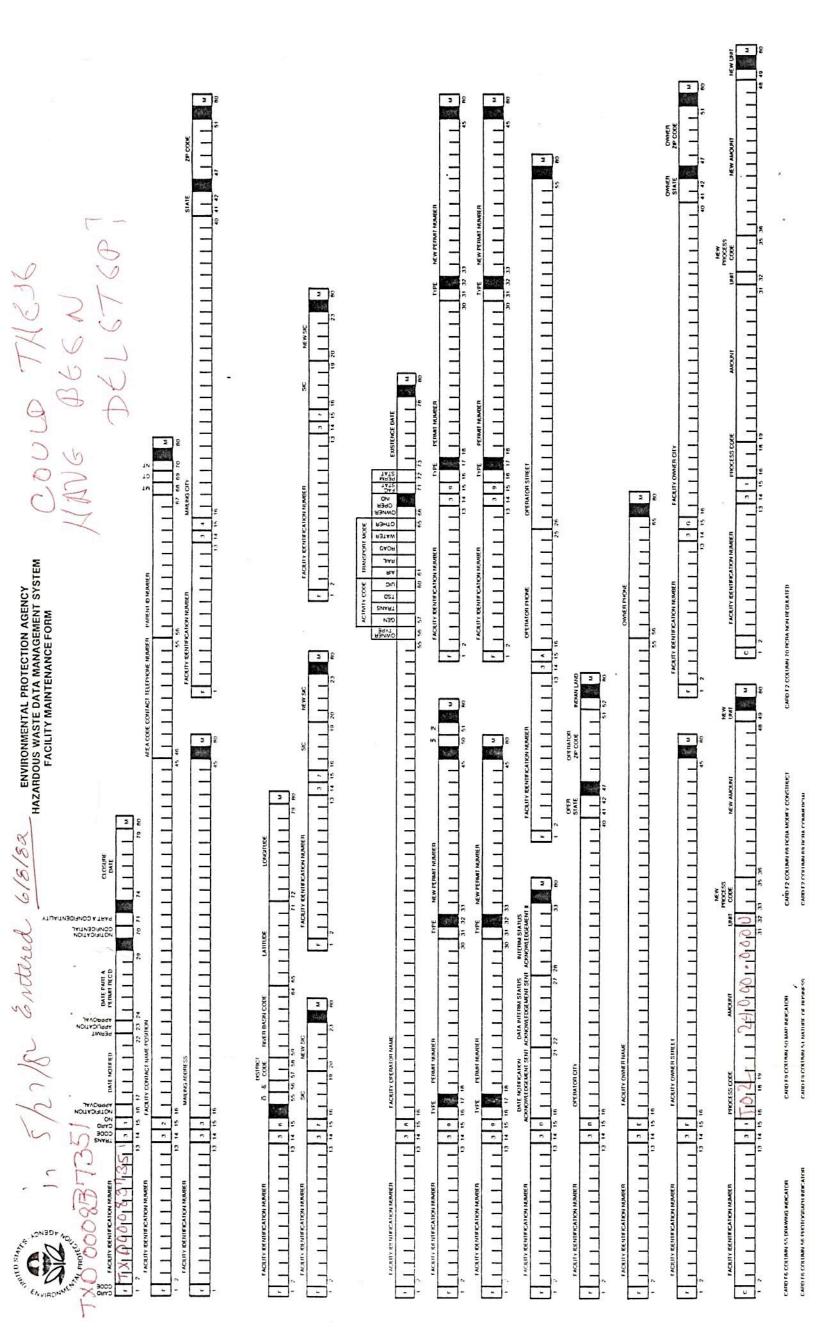
			Yes	No	Not Determined
	a.	Post-closure trust fund:			
	b.	Surety bond guaranteeing payment into a post-closure trust fund:			
	c.	23/55, 3 ()			
	d.	Post-closure letter of credit:			
		<pre>Insurance: Financial test/corporate</pre>			
	g.	<pre>guarantee: Multiple financial mechanisms:</pre>			
18.	Is <sup>f</sup>	certification considered plete? If no, explain in stion 22.			
19.	com	financial assurance considered plete? If no, explain in stion 22.			
20.	18, pla to	the answer to Questions 8, 9, or 19 is no, was a closure n submitted? If yes, continue Question 21. If no, go to stion 22.			
21.	18,	the answer to Questions 8, 9, or 19 is no, was a post-sure plan submitted?			
22.	Bri det	efly discuss the problems or discrepancies rermine if they are of a nature which prevent	ident ts fu	ifie rthe	d and r review.
		These units have been closed &	COIT	Frec	dbyo
	R	egistered P.E.			
	_7	WDR certified financial assurance &	5vdc	Sent	non-sidden
		suppose on 4/23/85.			

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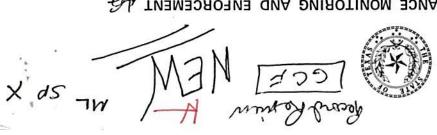
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# Hazardous Waste Compliance Monitoring and Enforcement Log

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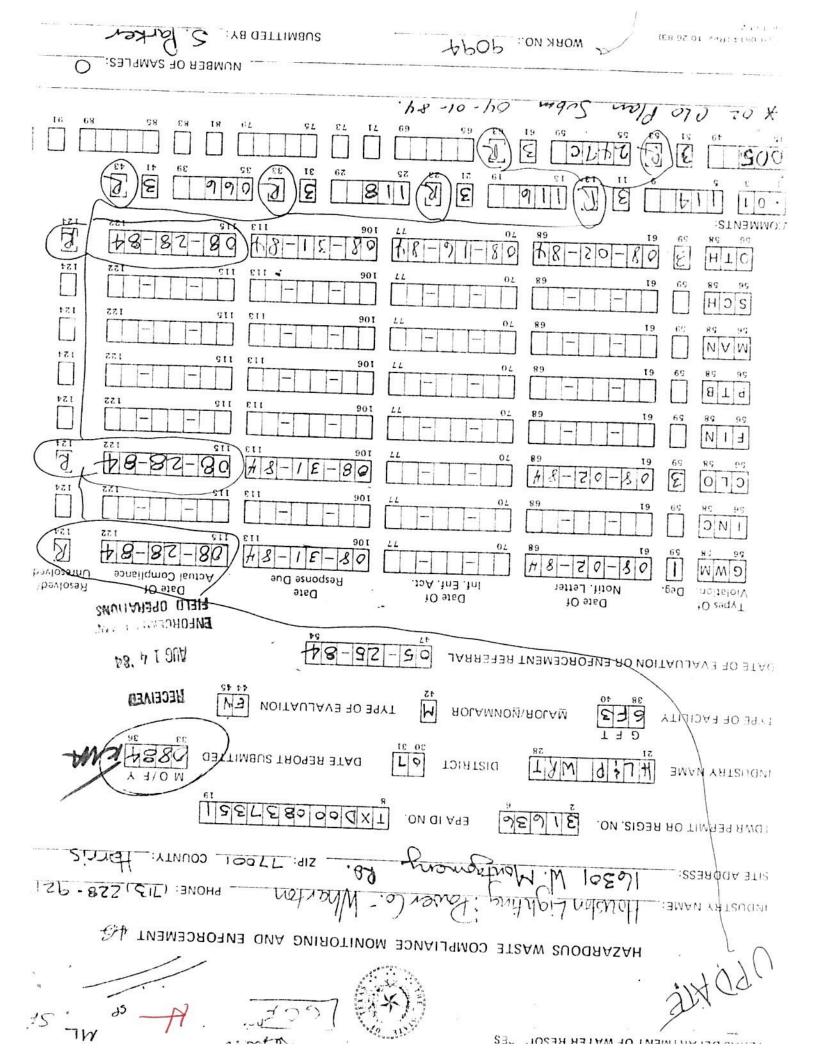
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## Hazardous Waste Compliance Monitoring and Enforcement Log

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### Attachment G

### T. H. Wharton Generating Station

Process Description for Hazardous Waste Streams

### 1. Demineralizer Regenerant (EPA Hazard Code C) Demineralizer Regenerant Inorganic Sludge (EPA Hazard Code E)

At T. H. Wharton Steam Electric Generating Station, there are three demineralizer units for the boiler make-up water treatment system. The demineralizer regenerant wastes from these three units flow by gravity to the concrete sumps and from there it is pumped to the acid retention pond for collection, equalization and self-neutralization. From the retention pond, the regenerant waste is pumped to the treatment system for pH adjustment and suspended solids removal prior to discharging to Greens Eayou. The treatment system consists of mixing, flocculation, settling, and pH readjustment mixing chambers. Some of the settleable solids are accumulated in the bottom of the acid retention pond. This settled sludge from the pond is periodically removed for off-site disposal.

### 2. Metal Cleaning Organic Acid (EPA Hazard Code E) Metal Cleaning Organic Sludge (EPA Hazard Code E)

The organic metal cleaning waste is collected in a lined organic cleaning waste pond for storage and sedimentation. The organic cleaning waste is hauled off-site for treatment and disposal. The sludge accumulated at the pond bottom is periodically removed for off-site disposal.

### 3. Metal Cleaning Inorganic Acid (EPA Hazard Code C,E) Metal Cleaning Inorganic Sludge (EPA Hazard Code E)

Boilers and other equipment are periodically cleaned by using a inhibited hydrochloric acid solution. This cleaning waste is piped by gravity to the Inorganic Cleaning Waste Retention Pond where it is collected and equalized. From the retention pond the wastewater is pumped to the treatment system as described for demineralizer regenerant, for heavy metals removal and pH adjustment before discharging to Greens Bayou. The portion of the sludge settled in the retention pond is periodically removed for off-site disposal.

### 4. Chemical Waste Treatment System Sludge (EPA Hazard Code E)

The sludge generated in the settling tank of the Chemical Waste Treatment System (treatment for demineralizer regenerant and inorganic metal cleaning waste) is pumped to the sand drying beds. The filtrate from the drying beds flows back to the retention ponds. The dried sludge is periodically removed for off-site disposal.

### 5. Waste Oil and Sludge (EPA Hazard Code T,O)

The waste oil and grease removed from the floor drainage treatment system and SPCC treatment system are collected in waste oil sumps. The collected waste oil and grease is periodically removed for off-site disposal. The oily sludge generated in the treatment system is dewatered in the sand beds (same sand bed used for chemical waste treatment system) and removed for off-site disposal.

### 6. Degreasing and Paint Solvent (EPA Hazard Code I,T)

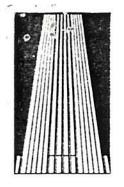
The degreasing and paint solvent waste is collected in drums. These drums are stored for off-site disposal.

### 7. Asbestos in Insulation (EPA Hazard Code T)

Asbestos insulation waste will be placed in bags and wet down prior to off-site disposal.

SA No. 0246-EPA-OT

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V. OWNERSHIP	The base of the same			n girkan	<b>建筑等</b> 。		1 49				100
8 H o u s t	on Lig	h t i n g	a n d	Powe		mpa	n y	П			
8. TYPE OF O (enter the appropriate	WNERSHIP re letter into box)	VI. TYPE OF HA	ZARDOUS	WASTE A	CTIVITY (er	iter "X" i	n the app	ropria	te bo	x(es))	Table 1
F = FEDERAL M = NON-FED	ERAL M	57	AT/STORE	DISPOSE		TRANSPOR				m VII)	1
VII. MODE OF TR	ANSPORTATIO	N (transporters on	ıly – enter '	'X" in the	ppropriate b	ox(es))		Sep.	18		To the
GI A. AIR	B. RAIL	X C. HIGHWAY	☐ D. V	WATER	E. OTHER	(specify):					
VIII. FIRST OR SI Mark "X" in the appn If this is not your first	opriate box to indi	cate whether this is your Installation's E	PA I.D. Numi	De Ling tries be	ication of hazz	elow.	e activity o	or a sui	bseque	ent not	ification.
XA. FIRST N	OTIFICATION	B. SUBSEC	QUENT NOT	IFICATION	UG 18 19 complete item	)80 : c)	C. INSTA	LLAT	ION'S	EPA I	.D. NO.
IX. DESCRIPTION		US WASTES			the second					100	AN 24 A
Please go to the revers EPA Form 8700-12 (		provide the requested	information.		SIL						
Era rom 6/00-12 (	-001	to the		2.				CONT	INUE	ON R	EVERSF



### Houston ( Lighting & Power Company

Electric Tower P.O. Box 1700 Houston Texas 77001

September 30, 1980

Executive Director
Texas Department of Water Resources
Attention: Permit Control & Records Section
P. O. Box 13087, Capitol Station
Austin, Texas 78711

SUBJECT: ADDITIONS AND MODIFICATIONS TO TOWR

HAZARDOUS WASTE PERMIT APPLICATIONS

### Gentlemen:

As referenced in our August 15, 1980 submittal letter accompanying our fourteen permit applications, Houston Lighting and Power Company is hereby updating those applications with the enclosed additions and modifications (seven copies each).

Where appropriate, Attachments E and F, completed page 10 and other revised pages are included for the following applications:

S. R. Bertron Generating Station
Cedar Bayou Generating Station
H. O. Clarke Generating Station
Deepwater Generating Station
Gable Street Generating Station
Greens Bayou Generating Station
W. A. Parish Generating Station
P. H. Robinson Generating Station
Webster Generating Station
T. H. Wharton Generating Station
Energy Development Complex
Underground Service Center
South Houston Facility
Houston Lighting and Power Service Area

Houston Lighting & Power Company

Page 2

SUBJECT: ADDITONS AND MODIFICATIONS TO TOWR

HAZARDOUS WASTE PERMIT APPLICATIONS

In addition the enclosed Attachments B and C complete the Energy Development Complex application.

Please contact us if you have any questions.

Sincerely,

W. F. McGuire, Manager

Environmental Protection Department

BCN/dhj Enclosures

### TEXAS DEPARTMENT OF WATER RESOURCES

### PERMIT APPLICATION

FOR

INDUSTRIAL SOLID WASTE STORAGE/PROCESSING/DISPOSAL FAC

PART A - FACILITY BACKGROUND INFORMATION

APPL. NO.	10501
COUNTY-DIST.	10501 Herris-7
BY CARD WALLE	
ADM. REVIEW BY	
COMPLETE	
COPIES SENT:	10115
LITY DIST 7	(CHECK)

1.	GENERAL	INFORMATION
----	---------	-------------

Applicant		2011 <b>- 7</b> 11 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1		H. Wharton Ger Other Legal En	
Address:	P.O. Box	1700			
	Houston	State:	Texas	Zip Code:	77001

- B. Authorized Agents
  - I. List those persons or firms authorized to act for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.
    - W. F. McGuire, Manager, Environmental Protection Development Houston Lighting & Power Company P.O. Box 1700, Houston, Texas 77001 (713) 481-7145 R. M. McCuistion, Vice-President, Power System Development Houston Lighting & Power Company P.O. Box 1700 Houston, Texas 77001 (713) 228-9211
  - List the individual and his/her mailing address that will be responsible for causing any necessary public notices to be published in the newspaper.

Name:	W. F. McGui	re			
Address:	P.O. Box 1	700	100	=	
City:	Houston,	State:	Texas	Zip Code:	77001
Telephon	e Number:	(713) 481		RECEIVED	
				,	AUG 1 8 1980

PERMIT CONTROL'

	3.	Lis	t the	applicant's authorized agent for service	•
		Nam	e:	J. R. Johnston	
		Add	ress:	P.O. Box 1700, 611 Walker	
			1	Houston, State: Texas Zip Co	de: 77001
			54-1142-		-
		iei	epnon	e Number: (713) 228-9211	
c.				Identify the entity who will conduct faci applicant, state "same as applicant."	lity operations.
	Na	me:_		Same as applicant	
	Ad	dres	s:	<u>u</u>	
			V	State: Zip Code:	
	ıe	repn	ione N	umber:	
D.	Ow	ners	ship		
	1.	Ind	licate	the ownership status of the facility:	
				A STATE OF THE STA	
		a.	Priv	atex	
				Corporation X	
				Partnership Proprietorship	
				Non-profit organization	
		b.	Pub I	ic	
			(1)	Federal	
			(2)	Military	
			(3)	State	
			(4)	Regional	
			(5) (6)	County Municipal	
		c.	Othe	r (specify)	
	2.	15	facil	ity <u>and</u> site property owned by applicant?	
		,	x Ye	s No	RECENTE
		-	-	FAST-	-SEIVED !
		l f	you c	hecked "no",	RECEIVED AUG 18 1980
					PERMIT C
				* * * * * * * * * * * * * * * * * * *	PERMIT CONTROL

TOWR

- a. Submit as an attachment a copy of the lease for use of said facility and/or site property, as appropriate; and
- b. Identify the facility owner. If same as applicant in Part A above, state "same as applicant." If different from the applicant, please note that the owner is required to sign the application on page 5.

Name:	Same as app	licant.		<u> </u>
Address:		<del></del>		
City:	St	ate:	Zip Code	:
Telephon	e Number:			
E. Type of I	Permit Applicat	ion:		
I. New 2. Amenda	ment X	(TDWR Permit	Number:	)

- F. Registration and Permit Information
  - I. Denote your TDWR Solid Waste Registration Number. If none, state "none."
    31636
  - 2. Indicate (by listing the permit number(s) in the appropriate column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the permit number, or the date of application, or "none".

Relevant Program and/or Law Government Permit No. Agency\* 8-15-80 TDWR Texas Solid Waste Disposal Act Wastewater disposal under the Texas 01039 TDWR Water Code c. Underground injection under the None Texas Water Code R-445, R-2094 TACB Texas Clean Air Act Texas Uranimum Surface Mining & None Reclamation Act f. Texas Surface Coal Mining & None Reclamation Act Hazardous Waste Management program under the Resource Conservation and 8-15-80 EPA Recovery Act

	UIC program under the Safe Drinking Water Act NPDES program under the Clean Water Act	None TX0006408	
i. j.	PSD program under the Clean Air Act	None	
k.	Nonattainment program under the Clean Air Act	None	
١.	National Emission Standards for Hazardous Pollutants (NESHAPS) precon- struction approval under the Clean Air Act	None	
m.	Ocean dumping permits under the Marine Protection Research and Sanctuaries Act	None	
n.	Dredge or fill permits under section	None	
ο.	404 of the Clean Water Act Other relevant environmental permits	None	

\* Use the following acronyms for each agency as shown below:

TDWR = Texas Department of Water Resources

TACB = Texas Air Control Board

TRC = Texas Railroad Commission

TDH = Texas Department of Health

TDA = Texas Department of Agriculture

EPA = U. S. Environmental Protection Agency

CORPS = U. S. Army Corps of Engineers

- G. Description of Business
  - 1. Give a brief description of the nature of your business.

Electrical Power Generation

2. List the principal products and/or services which are provided by your plant. Please itemize by Standard Industrial Classification (SIC) codes.

4911 Electrical Power Services

6990 5	XAS DEPA	ARTMENT OF WATER RESO		03211
	CATE 8/18/80	AUSTIN, TEXAS	ECEIPT NO.	
	ADDRESS for Hauston L	ghting & Pawer,	MOUNT 10,00 Howton, 2,	A.
	Suspense Fund 900	Special Fund 41		
	FY CC	FY	. cc	
	Sales Tax Fund 961	Special Fund 123		
	FY CC	FY	_ cc	
	General Rev. Fd 1, Unappropriated	Special Fund 153		
	FY CC	FY	_cc	- 1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1
	General Rev. Fd 1, Appropriated  FY 80 CC 11368	70.00 Special Fund 158	_cc	
	Comptr. Rev. Code 3750	_ Source of Funds	Refund on War#	P
	REMARKS: 12 mit aggi.	- Date Waste	Pastage	
	Type of Remistance Cashiers Chi & S. S. Birtren Bu St., Cid.  TOWN 0756  TOWN 0756  Town Sta Websier From His der Jen All  Un der Jounne dervice Co	L, J. H. wherten hen	the . Ene + 14 his	En . f. H. Februar

	R. M. McCuistion	Vice-President		
	(Name)	(Title)		
i I	(Name)	(Title)		
	Certify under penalty of law that I have per iar with the information submitted in this dand that, based on my inquiry of those individual for obtaining the information, I believe that accurate, and complete.	document and all attachments viduals immediately responsible		
\$	Signature: MMC Civition	_, Date: 8.15_80		
	Signature:	, Date:		
13	SUBSCRIBED AND SWORN to before me by the said $\overline{\mathscr{L}}$ .			
:-	on this day	of <u>August</u> , 19 80.		
1	My commission expires on the	of <u>march</u> , 19 84.		
		Debra R. Blackbur, Notary Public in and for		
		County, Texas		

### II. SITE BACKGROUND INFORMATION

	0 - 1000 E. E. E.				
Λ	Loca	AT LAN	A+	51	7 0
n .	LUCE	11 1011	01	J 1	1 6

	Street Address, i	f available:	16301	W. Montgomery (FM-149)
	Houston, Texas	_	nty:_	Harris
2.	Are your waste ma			within the extraterritorial

Yes \_\_\_\_ No

If you checked "yes," what municipality? Houston

- Give a verbal description of the location of the facility site with respect to known or easily identifiable landmarks.
   See item 4 below
- 4. Detail the access routes from the nearest U.S. or State Highway to the facility site.

Approximately 8 miles northwest of the intersection of I-45 and FM-149.

- 5. Submit as "Attachment A" a United States Geological Survey (USGS), 7½ minute quadrangle map. Indicate on this map the location of the site and the land use patterns of the areas within ' mile (1.6 km) of the site boundaries (e.g., residential, commercial, recreational, agricultural, undeveloped, etc.). Each area of land use should be labeled on the map. (Note: if such a map is not available, submit a substitute map such as a State Department of Highways and Public Transportation county map with sufficient scale to adequately show the site location and surrounding land use patterns.
- 6. a. Submit as "Attachment B" a map indicating the boundaries of all adjacent parcels of land, and a list of the names and mailing addresses of all adjacent landowners and other nearby landowners who might consider themselves affected by the activities described by this application. Cross-reference this list to the map through the use of appropriate keying techniques. The map should be a USGS map, a city or county plat, or another map or drawing with a scale adequate enough to show the cross-referenced affected landowners.

	b.	Indicate from what source(s) the names and addresses of persons identified as affected were obtained.
		City County School District Water District Abstract Co. Other (specify)
7	. Ent	er the geographical coordinates of the site:
	La	titude: N29 deg 56 min 28 sec
	Lo	ngtitude: W95 deg 31 min 54 sec
8	. Is	the facility located on Indian lands? Check one:
		Yes X No
B. L	egal	Description of Site
I P	and u ermit	as "Attachment C" a legal description of the entire tract of con which the waste management operations referred to in this application occur or will occur.
Ī	. CI	imatic and Hydrologic
	a.	Is any portion of your waste management facility site (including proposed, active, and inactive portions) subject to flooding from adjacent or nearby surface water bod as under the following conditions?
		24-hr Rainfall Event Yes No
		5-year <u>X</u> 50-year <u>X</u> 100-year <u>X</u>
	b.	Are there any producing groundwater wells on your site property?
		X YesNo  If you checked "yes,"
		(I) Indicate the number of such wells: eight (8), and

	(2)	Indicate the corresponding water uses below:
		(a) Industrial uses:  Cooling water X  Process water X  Fire-control water X
		(b) Potable (drinking) water X
		(c) Agricultural uses: Irrigation water for livestock food crops or grazing land Livestock watering Irrigation water for human food crops
с.		any adjacent or nearby surface waters utilized by the icant?
	7 <u>-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1</u>	Yes X No
	lf yo	ou checked "yes," indicate the corresponding water uses
	(1)	Industrial uses: Cooling water Process water Fire-control water
	(2)	Potable (drinking) water
	(3)	Agricultural uses: Irrigation water for livestock food crops or grazing land Livestock watering Irrigation water for human food crops
2. Sit	e Lan	d Use and Subsidence Information
а.		ny portion of the overall site property utilized for cultural purposes?
		Yes X No
	lf y	ou checked "yes," indicate the corresponding uses below:
	(2) (3)	Grazing Livestock food crop Human food crop ou checked no. (2) or (3), specify the types of crops
b.		ny portion of the overall site property subject to land idence?
	<u>x</u>	Yes No

If you checked "yes," estimate the magnitude of the greatest subsidence that has occurred (in units of feet). 0.6 ft (1973-1978)

### III. WASTES AND WASTE MANAGEMENT

A. Waste Generation and Management Activities

Is any hazardous industrial solid waste (see Title 40, Code of Federal Regulations, Part 261) presently or proposed to be generated at your facility?

X Yes No

If you checked "no," go to Section III.B.2. below.
If you checked "yes," answer the following question.

1. Are you presently registered with TDWR as a solid waste generator?

If you checked "no," contact the Solid Waste Section of TDWR in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

If you checked "yes," go to Section I of your Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-I (see Number 2 below).

 Complete Table III-I below, listing all hazardous wastes and all mixtures containing any hazardous waste which are presently or proposed to be generated at your facility. (see 40 CFR 261.31-33), attaching additional copies as necessary.

In this table, "TDWR Sequence Number" refers to the number in the left-hand column in Section I of your Notice of Registration (Note: if you are not registered with TDWR, enter "NA" for TDWR Sequence Number and TDWR Waste Code Number).

For the EPA Hazard Code and EPA Hazardous Waste Numbers, see 40 CFR 261.30-33. For annual quantity, provide the amount in units of pounds (as generated) for each waste and/or waste mixture.

Please group the listings of wastes by SIC code, insofar as your processes are designated by SIC codings. Also, within the general SIC code groups, give a brief description of the specific process or operation from which the waste has been generated.

- B. Waste Management Facilities Summary
  - For each waste and waste mixture listed in Table III-I that is
    presently or proposed to be managed on-site, provide the summary
    sheet shown in Table III-2 (Note: you must make copies of Table
    III-2 and submit the completed set of tables as "Attachment D").

### F. H. Wharton Generating Station

Table 111.1 Generated Bazardons Wastes and Management Activities

Verhal	IIWAII	HWII	7.	- <-		Waste Mana grack ap	Waste Management Activities (Check applicable items)		Annual	SIC
Description	Sequence	Waste Code	Hazard	Hazardons	UII Site		On Site	1	Generated	pu
of Waste	Number	Number	Code	Waste No.	Disposal	Stornge	Processing"	Disposal	(lbs)	Process
emineralizer egenerant	< Z	٧ 2	Ľ.	0000		×	×		408,000,000*	•
emineralizer Regenerant	rantz	140540	<b>=</b>		×	×	. !		*	
norganic Acids	V N	NN	F. C	0007,0002	7.2	×	× ,		18,880,000*	
nlc Sludg	2	140540	<u>=</u>		×	×			**	
rganle Acids	VN	ij	2		×	×	×		20,820,000*	
rganic Sludge	V N	148990			×	×	£		**	
	< Z	< Z	ш	0007	×	×	×	!	137,500	
aste Oil & Sludge	Ĵ	110450	T.0	F 0 0 3	×	×	×		52,050	!
aint Solvents	V Z	٧ <sub>N</sub>	т.	F005	×	×	18 10 10		10,800	
sbestos in Insulation NA	VN uo	170750	÷	110113	×	×	×		(***) **	
Untreated amounts, normally treated and discharged under wastewater permits	ally treat	ted and disch	arged (	ınder waste	water pe	rmits.				)
	¥0						* * *			

<sup>\*</sup> Unknown, small amount.

. . .

## \*\*) Actual percent asbestos content is variable but small

<sup>1. &</sup>quot;Storage" means the interim containment or control of waste after generation and prior to ultimate disposal,

<sup>&</sup>quot;Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse in disposal, including the treatment or neutralization of hazmidous waste so as to render such waste nonhazardous, safer for transport, amenable for recovery, amenable for storage, or reduced volume. The "transfer" of solid waste for reuse or dispusal as used above, does not include the actions of a carrier in conveying or transporting solid waste by truck, stilp, pipeline, or other means.

2. Has the applicant at any time conducted the on-site storage, processing, or disposal of industrial solid waste now identified or listed as hazardous waste?

χ Yes No

If you checked "yes," complete Table III-3 indicating the hazardous industrial solid waste management facility components which were once utilized at your plant site but are no longer in service (i.e., inactive facility components).

If you checked "no," and if no hazardous industrial solid waste is presently or proposed to be generated or managed at your facility, then you need not file this permit application. Otherwise, proceed with application form.

3. For each facility component indicated in Table III-2 (Attachment D) and Table III-3, complete the following Table III-4 attaching additional copies as necessary. Enter the name of each facility component as specified in the earlier tables.

Give the design capacity of each facility component in any of the units shown. In the case of inactive facilities for which design details are unavailable, an estimate of the design capacity is sufficient.

Please note that each facility component should be described in your own words on the line provided for "verbal description."

- 4. Provide an estimate of the total weight (lbs) of hazardous industrial solid waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.
- C. Location of Waste Management Facilities and Components
  - Submit as "Attachment E" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile (and only one mile) beyond the property boundaries of the overall plant site, depicting the following:
    - a. The approximate boundaries of the site (described in Section II B) and within these boundaries, the location and boundaries of the areas occupied by each active, inactive, and proposed facility component (see Tables III-2 and III-3 for facility components). Each depicted area should be labeled to identify the facility component(s), component status (i.e., active, inactive, or proposed), and area size in acres.

### Table III-3 Inactive Hazardous Industrial Solid Waste Management Facility Components No inactive facility components

Indicate the inactive facility components which were used for storage/processing/disposal of hazardous wastes or mixtures containing any hazardous waste by entering the number of such facility components in the space provided.

Lagod	on/Pond (lined)	Landspreading	Area
Basir	n (earthen, above-grade lined)	Spray Irrigati	on Area
Basir	n (earthen, above-grade unlined)	Flood Irrigati	on Area
Basir	n (earthen, below-grade lined)	Septic Tank/Dr	ain Field
Basir	n (earthen, below-grade unlined)	Injection Well	
Basir	n (concrete, above-grade lined)	Tank (surface	storage)
Basir	n (concrete, above-grade unlined)	Tank (sub-surf	face storage)
Basir	n (concrete, below-grade lined)	Tank (surface	processing)
Basiı	n (concrete, below-grade unlined)	Tank (sub-sur	face processing
Basiı	n (other)	Tank (other)	
Pit	(lined)	Drum Storage A	Area (open)
Pit	(unlined)	Drum Storage A	Area (enclosed)
lncii	nerator	Drum Storage A	Area (other)
Open	Controlled Incineration Area	Bulk Storage A	Area (open)
Boile	er (energy-producing)	Bulk Storage A	Area (enclosed)
Land	fill (sanitary)	Bulk Storage A	Area (other) 🏓
Land	fill (surface, open)	Other (specify	·
Land	fill (other)		<u> </u>
			THE RESIDENCE ASSESSMENT ASSESSMENT OF THE PARTY OF THE P

Facility Component			Status		Design Capacity	t y	Number of	Date
Лапе	Seq. No.	Inactive	Active Proposed	(cn yds)	(1eg)	(168)	Utilized	Service
Lagoon/Pond (lined)			×		1,000,000		-	1979
Verbal Description:	Clay lined pond for the collection	for the coll	∞	equalization of c	demineralizer r	regeneration wastes	prior	to
eatment. Sludge accu	Sludge accumulated at the pond bottom is	pond bottom		periodically removed for	off-site	disposal.		Ì
*Tank (Surface Processing)	(gu		×		63,300		-	19
Verbal Description:	Treatment system (Surface processing)	(Surface pr	ocessing) for	· neutralization	on consists of	One (1)mixing	g chamber(3000	O gallon
one(1) flocculation chamber (6,000 gallon),one(1)	mber (6,000 gal		settling char	chamber (54,000 g	gallon)and one	(1) pH readjustment		chamber gallon
Lagoon/Pond (lined			×		1,000,000		-	1979
Verbal Description:	Clay lined pond for the collection	for the coll	of	metal cleaning i	inorganic acid	wastes from boiler	∞	equipment
cleaning operations prior to treatment.	or to treatment	Sludge accumulated	cumulated at	the pond bott	the pond bottom is periodically removed for off-site	ally removed 1	for off-site	disposal
Lagoon/Pond (lined)			×		4,500,000		-	1979
"grbal Description: Cl	Clay lined pond for the collection of metal	or the colle	ction of met	l cleaning organic		acids from boiler clea	cleaning operations	ions prio
to off-site disposal.	Sludge accumulated at the pond bottom	ted at the p	ond bottom is	s periodically removed	for	off-site disposal	sal.	
Basin (earthen, below-grade lined)	rade lined)		×	576 (ea)			-	1979
Verbal Description: Two clay lined sand drying beds	o clay lined sa	and drying be	for	the collection & pr	processing of sl	sludge dewatering from the		chemical
waste treatment system and oily waste treatment system.	and oily waste	treatment sy	stem. Dried	sludge is per	periodically removed	ved for off-site	ite disposal	
Basin (concrete, below-grade lined)	grade lined)		×		3,000		2	1978
Verbal Description: Ta	Tank used for the collection of	collection	of waste oil	& sludge which	th is accumulated	from the	oily waste tr	treatment
system. This waste is	This waste is periodically trucked off-site	ucked off-si	te for disposal	sal.				

### Table III illo a seq. Waste Lacility Components List

Lacility Component	_		Status		l	Design Capacity	ity	Number of	Date
Name	Seq. No.	ovi Leal	Aclive	Prepared Prepared	(cu yds)	(Jeg)	(168)	Vears	Service
Other	1		×		NA	NA	NA	NA	NA
Verbal Description: Asbe	stos used f	or insulati	On will	be placed	in bags an	d wet down p	Asbestos used for insulation will be placed in bags and wet down prior to off-site disposal	te disposal.	
Actual percent asbestos content is variable but	os content	is variable	but small.	1.					(
Drum storage area (other)			×		NA	VN	NA	VN	
Verbal Description: Orum	storage are	Drum storage area for the collection of waste	ollection	n of waste	solvents	used in degr	solvents used in degreasing and painting operations	nting operat	ions —
prior to off-site disposal.								2	
Verbal Description:									
									.
North Days			****						
The last of the second									0
									1
Verbal Description:									
		Market St. Constitution of the State of the		*					
				3					
Verbal Description:									
		**************************************							

 The overall facility and all surface intake and discharge structures;

- c. All injection wells where liquids are injected underground;
- d. All known monitor wells and boreholes within the property boundaries of the overall plant site; and
- e. All wells, springs, other surface water bodies, and drinking water wells within the map area and the purpose for which each water well is used (e.g., domestic, livestock, agricultural, industrial, etc.).
- Submit as "Attachment F" photographs which clearly delineate all hazardous waste facility structures and storage, processing, and disposal areas, as well as sites of future storage, processing, and disposal areas.

#### D. Flow Diagram/Description

Show as "Attachment G" process flow diagrams or step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each of the hazardous wastes previously listed in this application.

The flow diagrams or descriptions should include the following information:

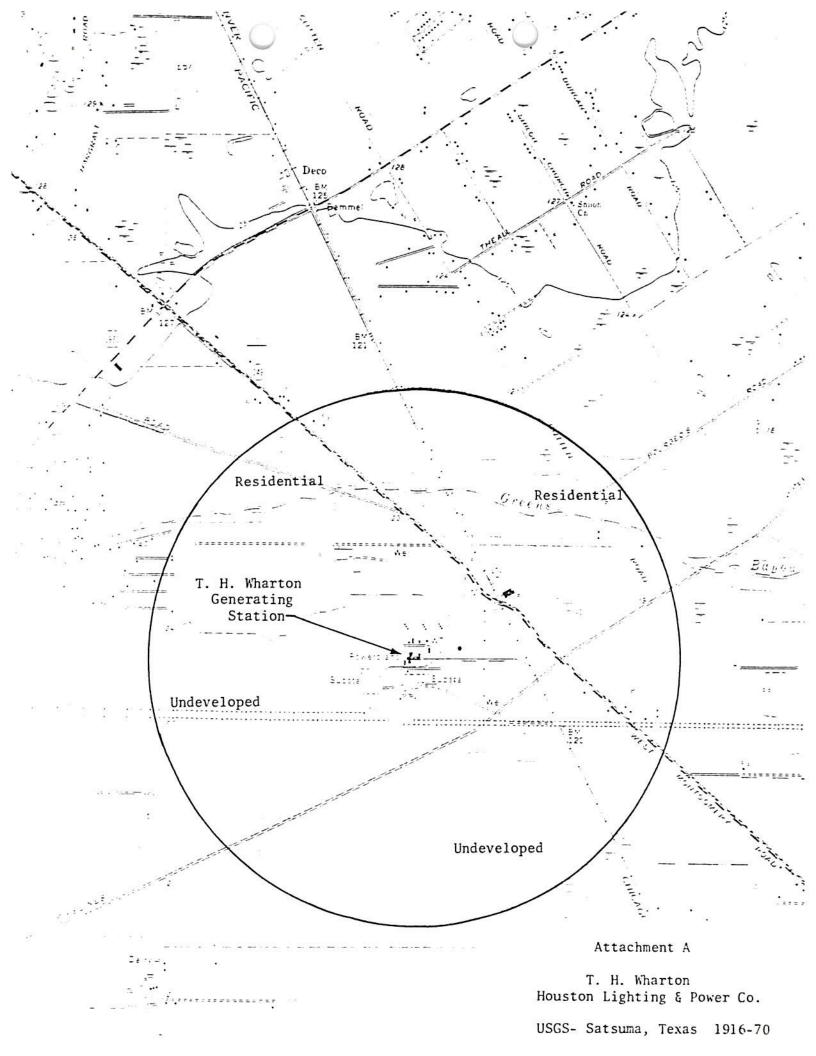
- 1. Originating point of each waste and waste classification code:
- 2. Means of conveyance utilized in every step of the process flow;
- Name and function of each facility component through which the waste passes;
- The ultimate disposition of all wastes (if off-site, specify "off-site") and waste residues.

#### IV. INDEX OF ATTACHMENTS

List and index below all attachments to this application and indicate if included or not included:

<u>Item</u>	Mandatory Attachments	Attachment	Included	Not Included
II.A.5.	USGS map	<u>A</u>	<u>x</u>	
II.A.6.a.	Affected landowners	<u>B</u>	<u>X</u>	
11.B.	Site legal description	<u>c</u>	<u>X</u>	-
III.B.I.	Hazardous waste facility component summary sheets	<u>D</u>	<u>x</u>	-
111.C.I.	Facility boundaries and adjacent waters map	<u>E</u>		<u>X</u>
111.C.2.	Photographs	<u>F</u>		<u>_x</u> _
III.D.	Process flow diagram/description	<u>G</u>	<u>x</u>	<del></del>
10 200 200 200 200	Other Attachments as Required			
I.D.2.a.	Lease	_NA		
111.A.2.	Additional generated waste list (Table III-I)	_NA		
III.B.3.	Additional hazardous waste facility components list (Table III-4)	12	_X_	

ATTACHMENT A



ATTACHMENT B

### T. H. WHARTON POWER PLANT ADJOINING OWNERSHIP

SOURCE: Harris County Tax Roll

PARCEL NO.	NAME & ADDRESS OF OWNER
1	William M. Rice University P. O. Box 2666
	Houston, Texas 77001
2	Mahan-Thomas No. 101
	14637 Pebble Bend Houston, Texas 77068
*	nouscon, lexas 77000
3	Silco 135, Ltd.
	c/o Clarke & Co. 2510 Times Blvd.
	Houston, Texas 77005
4	Thurmond A. Williamson
4	P. O. Box 57105
	Dallas, Texas 75207
5	Joe Rutland
	CSA Ltd., Inc.
	P. O. Box 38073
	Houston, Texas 77088
6	Kurth Walker Lumber Co.
	P. O. Box 40158
	Houston, Texas 77040
7	Lone Star Plywood & Door Corp.
	P. O. Box 607 Irving, Texas 75060
	iiving, lexas 75000
8	Mrs. Pete Terpestra
	14960 Wunderlich Houston, Texas 77069
9	Alice T. Ripley
	448 W. 28th Houston, Texas 77008
100	HORE SHEET SHEETS WAS TO HE WITH MAN WAS ARRESTED FOR THE STATE OF THE SHEET SHEETS AND AND AN ARREST SHEETS AND AN ARREST SHEETS SHEETS AND AN ARREST SHEETS SHEET
10	United Texas Transmission Co. #3356 P. O. Box 1478
•	Houston, Texas 77001
11	E. G. McMillan, et al (½ interest)
11	8989 Westheimer, Suite 200
	Houston, Texas 77063
	Herb Handley ( interest)
	5505 Russett
	Houston, Texas 77042
12	Colonial Savings Association
	P. O. Box 36443
	Houston, Texas 77036
13	E. G. McMillan, et al (1/2 interest)
	8989 Westheimer, Suite 200 Houston, Texas 77063
	nouston, lexas //003
	Herb Handley (½ interest)
	5505 Russett Houston, Texas 77042
	houston, Texas //042

# ATTACHMENT B T. H. WHARTON POWER PLANT ADJOINING OWNERSHIP

SOURCE: Harris County Tax Roll

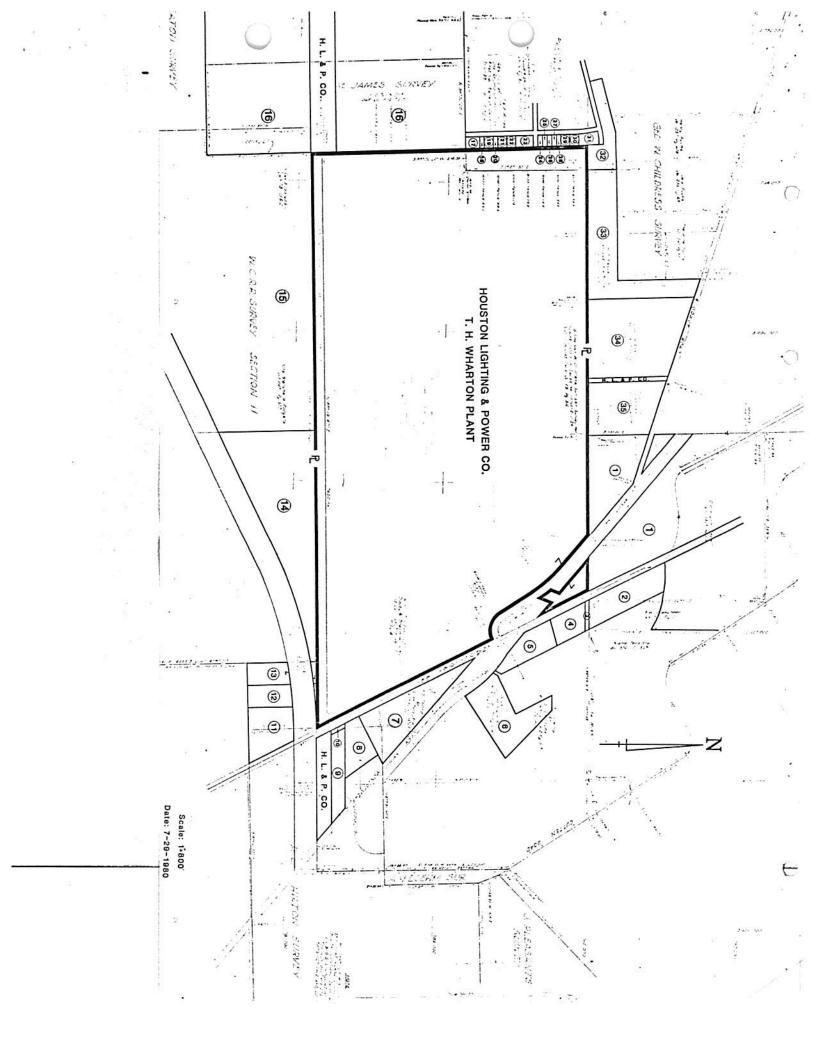
PARCEL NO.	NAME & ADDRESS OF OWNER
14	Parkwood #102, Ltd. Attn: J. Lagoata 2737 Buffalo Spdwy Houston, Texas 77098
15	The Alfa Co. (1/3 interest) c/o William G. Lawhon 1100 Esperson Bldg. Houston, Texas 77002
	N. V. Doral (2/3 interest) c/o William G. Lawhon 1100 Esperson Bldg. Houston, Texas 77002
16	Ben Taub (1/5 interest) 909 Franklin Houston, Texas 77002
S	Mary Taub Hibbert (1/5 interest) c/o L. G. Walker & Assoc. 546 The Main Bldg. Houston, Texas 77002
	Rosa Kahn (1/5 interest) T/A 46827-01 c/o Texas Commerce Bank NA P. O. Box 2558 Houston, Texas 77001
	Hilda Raphael Schwartz (1/5 interest) 2350 Braeswood Blvd. Houston, Texas 77030
	Henry J. N. Taub (1/10 interest) 909 Franklin Houston, Texas 77002
£ £	John Ben Taub (1/10 interest) P. O. Box 27423 Houston, Texas 77027
17	Jesse Hickman 3777 Arnold Houston, Texas 77005
18	William E. Goad 11714 Rockland Houston, Texas 77064
19	Minor E. Kerr 11718 Rockland Houston, Texas 77064
20	Eduardo E. Garza 11806 Rockland Houston, Texas 77064
21	Charles Newton 1539 W. 23rd Houston, Texas 77008
22	R. L. Walton 414 Palmyra Houston, Texas 77022

2 of 3

# ATTACHMENT B T. H. WHARTON POWER PLANT ADJOINING OWNERSHIP

SOURCE: Harris County Tax Roll

200,000	PARCEL NO.		NAME & ADDRESS OF OWNER
	23		W. W. Campbell 11902 Rockland
			Houston, Texas 77064
	24		W. W. Campbell, et ux
			11902 Rockland Houston, Texas 77064
	25		Willie Wayne Campbell
			11902 Rockland Houston, Texas 77064
	26		Clyde L. Byrne
	20		213 W. 18th
			Houston, Texas 77008
	27		Anastacia Garza
			11914 Rockland
			Houston, Texas 77064
	28		T. C. Stallones
			14718 Pine Warbler
			Tomball, Texas 77376
	29		Paul J. Waldrop
			Rt. 12, Box 1854-B
			Houston, Texas 77040
	30		Rex R. Michael, et ux
			12010 Rockland
			Houston, Texas 77064
	31		Charles R. Blunt
			8535 Shoal Creek
		92	Houston, Texas 77064
	32		C. C. McMillan
			c/o Franklin, Kelly & Graham
			Cotton Exchange Bldg.
	×		Houston, Texas 77002
	33		Joe P. Klores
			Rt. 2, Box 114
			Alto, Texas 75925
	34		Larry R. Womack
			3103 Harrisburg
			Houston, Texas 77003
	35		Delta Engineering Co.
			c/o Ray Arterburn
			6906 Atkiell, Suite 209 Houston, Texas 77081



ATTACHMENT C

### ATTACHMENT "C"

# LEGAL DESCRIPTION OF T. H. WHARTON POWER PLANT

Those certain tracts or parcels containing 569.443 acres of land located in the G. W. Childress Survey, A-217, and W. H. York Survey, A-943, Harris County, Texas, being out of 574.612 acres conveyed to Houston Lighting & Power Company by the following deeds:

	GRANTOR	DATE	VOL/PAGE	ACREAGE
1)	F. S. Clancy	05-04-45	1380/165	26.520
2)	F. S. Clancy	12-13-48	1864/29	536.580
3)	F. S. Clancy	07-26-50	2132/164	11.512

Less and except 5.169 acres conveyed by Houston Lighting & Power Company as follows:

	GRANTEE	<u>DATE</u>	VOL/PAGE	ACREAGE
1)	State of Texas	08-19-60		5.169

ATTACHMENT D

Verbal Description of Waste	Demineralizer Regenerant
Process (see last column in Table III-I)	Water Treatment
TDWR Sequence Number of Waste (if assigned)	NA .
Incicate the facility components used for stor specified waste by entering the number of such is managed.	rage/processing/disposal of the above- n facility components by which this waste
Lagoon/Pond (unlined)	Landfarm
1 Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grace unlined)	Flood Irrigation Area
Basin (eartnen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Wel!
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	* Tank (surface processing)
Basin (concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	Other (specify
Landfill (other)	1

Verbal Description of Waste	Demineralizer Regenerant Inorganic Sludge
Process (see last column in Table III-I)	Water Treatment
TDWR Sequence Number of Waste (if assigned)	2
Indicate the facility components used for store specified waste by entering the number of such is managed.	rage/processing/disposal of the above- h facility components by which this waste
Lagoon/Pond (unlined)	Landfarm
1 Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (eartnen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grace lined)	Tank (surface storage)
Basin (concrète, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grace lined)	Tank (surface processing)
Basin (concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	1 Other (specify periodically removed
Landfill (other)	for off-site disposal

Verbal Description of Waste	Metal Cleaning Inorganic Acids
Process (see last column in Table III-I)	Boiler & equipment cleaning operations
TDWR Sequence Number of Waste (if assigned)	NA
Indicate the facility components used for sto specified waste by entering the number of suc is managed.	
Lagoon/Pond (unlined)	Landfarm
1 Lagoon/Pond (lined)	Lancspreading Area
Basin (earthen, above-grade lined)	Spray !rrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	injection Wel!
Basin (concrete, above-grade linec)	Tank 'surface storage.
Basin (concrete, above-grade unlined)	Tank sub-surface storage:
Basin (concrete, below-grade lined)	*1 Tank .surface processing;
Basin (concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (linea)	Drum Storage Area (open)
Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	Other (specify
Landfill (other)	)

Table 111- nazaruous maste management Factiffy component Summary Sheet

Verbal Description of Waste	Metal Cleaning & Other Inorganic Sludge
Process (see last column in Table III-I)	Boiler & Equipment Cleaning Operations and Boiler Blowdown
TDWR Sequence Number of Waste (if assigned)	NA .
Indicate the facility components used for sto specified waste by entering the number of suc is managed.	
Lagoon/Pond (unlined)	Landfarm
1 Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grace lined)	Spray Irrigation Area
Basin (earthen, above-grace unlined)	Flood Irrigation Area
Basin (eartnen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin (concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
— Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed).
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	1 Other (specify periodically removed
Landfill (other)	for off-site disposal

Verbal Description of Waste	Metal Cleaning Organic Acids
Process (see last column in Table III-I)	Boiler Cleaning Operations
TDWR Sequence Number of Waste (if assigned)	NA ·
Indicate the facility components used for sto specified waste by entering the number of suc is managed.	orage/processing/disposal of the above- th facility components by which this waste
Lagoon/Pond (unlined)	Landfarm
1 Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lines)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (eartnen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage:
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin (concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	1 Other (specify off-site treatment
landfill (other)	,

Verbal Description of Waste	Metal Cleaning Organic Sludge
Process (see last column in Table III-I)	Boiler Cleaning Operations
TDWR Sequence Number of Waste (if assigned)	NA ·
Indicate the facility components used for sto specified waste by entering the number of suc is managed.	orage/processing/disposal of the above- ch facility components by which this waste
Lagoon/Pond (unlined)	Landfarm
1 Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin (concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	1 Other (specify periodically removed
landfill (other)	for off-site disposal

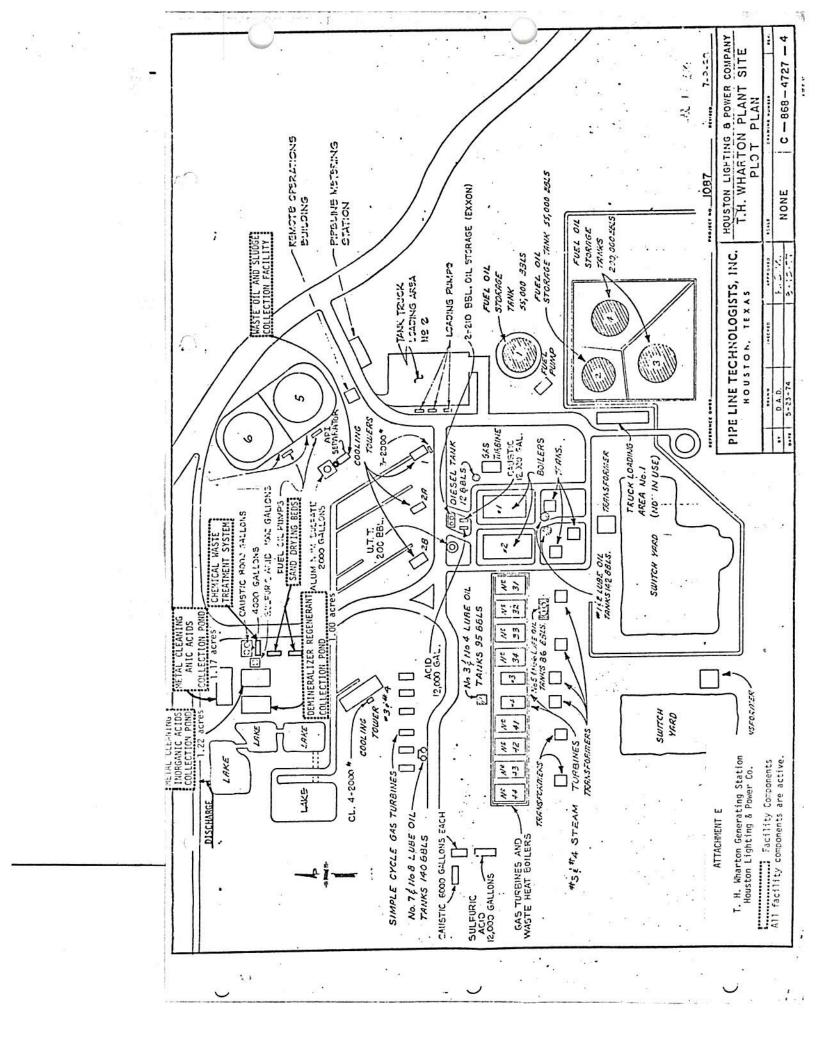
Verbal Description of Waste	Chemical Waste Treatment System Sludge											
Process (see last column in Table III-I)	Sludge generated from wastewater treatment											
TDWR Sequence Number of Waste (if assigned)	NA processes.											
Indicate the facility components used for st specified waste by entering the number of su is managed.	orage/processing/disposal of the above- ch facility components by which this waste											
Lagoon/Pond (unlined)	Landfarm											
Lagoon/Pond (lined)	Landspreading Area											
Basin (earthen, above-grade lined)	Spray Irrigation Area											
Basin (earthen, above-grade unlined)	Flood Irrigation Area											
4 Basin (earthen, below-grade lined)	Septic Tank/Drain Field											
Basin (earthen, below-grade unlined)	Injection Well											
Sasin (concrete, above-grade lined)	Tank (surface storage)											
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)											
Basin (concrete, below-grade lined)	Tank (surface processing)											
Basin (concrete, below-grade unlined)	Tank (sub-surface processing)											
Sasin (other)	Tank (other)											
Pit (lined)	Drum Storage Area (open)											
Pit (unlined)	Drum Storage Area (enclosed)											
Incinerator	Drum Storage Area (other)											
Open Controlled Incineration Area	Bulk Storage Area (open)											
Boiler (energy-producing)	Bulk Storage Area (enclosed)											
Landfill (sanitary)	Bulk Storage Area (other)											
Landfill (surface, open)	1 Other (specify <u>dried sludge</u> periodicall											
Landfill (other)	removed for off-site disposal)											

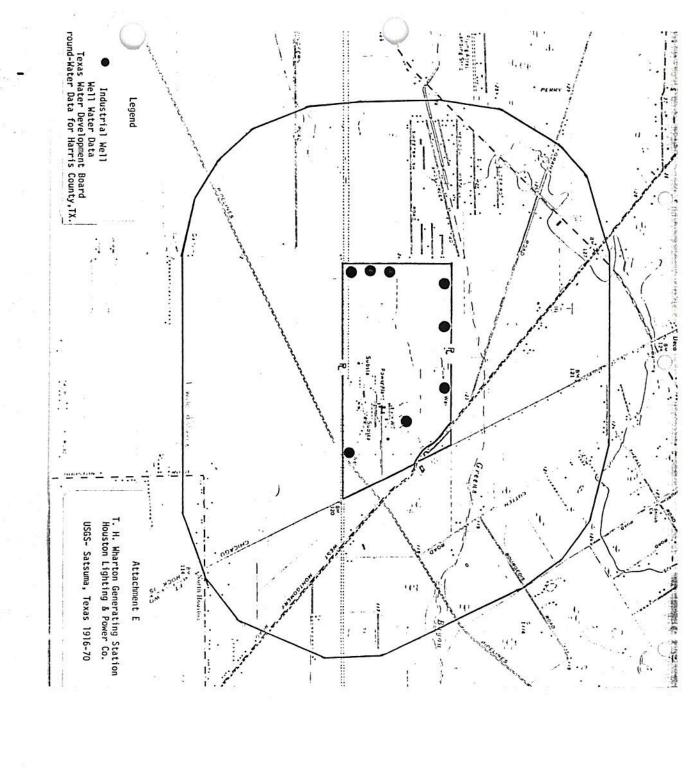
Verbal Description of Waste	Waste Oil and Sludge
Process (see last column in Table III-I)	Oil & sludge from oily waste treatment system
TDWR Sequence Number of Waste (if assigned)	1
Indicate the facility components used for st specified waste by entering the number of su is managed.	orage/processing/disposal of the above- ch facility components by which this waste
Lagoon/Pond (unlined)	Landfarm
Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
2 Basin (earthen, below-grade lined)	Septic Tank/Drain Field
1 Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grace lined)	Tank (surface processing)
Basin (concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	1 Other (specify <u>dewatered s</u> ludge and
Landfill (other)	waste oil are trucked off-site)for disposal

Verbal Description of Waste	Degreasing and Paint Solvent									
Process (see last column in Table III-I)	Degreasing and Painting Operations									
TDWR Sequence Number of Waste (if assigned)	NA .									
indicate the facility components used for sto specified waste by entering the number of suc is managed.	orage/processing/disposal of the above- on facility components by which this waste									
agoon/Ponc (unlined)	Landfarm									
agoon/Ponc Tined)	Landspreading Area									
Basin (earthen, above-grade lined)	Spray Irrigation Area									
Basin (earthen, above-grace unlined)	Flood irrigation Area									
Basin 'earthen, below-grade lined)	Sectic Tank/Drain Field									
Basin rearrnen, below-grade unlined)	injection Well									
Basin 'concrete, above-grade lined'	Tank (surface storage)									
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)									
Basin _concrete, below-grace lined)	Tank surface processing									
Basin (concrete, below-grase unlined)	Tank (sub-surface processing)									
Basin (other)	Tank (other)									
=: (lined)	Drum Storage Area (open									
— Pit (unlined)	Drum Storage Area (enclosed)									
Incinerator	1 Drum Storage Area (other)									
Open Controlled Incineration Area	Bulk Storage Area (open)									
Boiler (energy-producing)	Bulk Storage Area (enclosed)									
Landfill (sanitary)	Bulk Storage Area (other)									
Landfill (surface, open)	1 Other (specify drums are trucked off-sit									
Landfill (other)	for disposal									

Verbal Description of Waste	Asbestos
Process (see last column in Table III-I)	Insulation
TOWR Sequence Number of Waste (if assigned)	NA .
incicate the facility components used for st specified waste by entering the number of su is managed.	rorage/processing/disposal of the above- uch facility components by which this waste
Lagoon/Ponc (unlined)	Landfarm
agoon/Fonc (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grace unlined)	Flood irrigation Area
Basin (earthen, below-grade lined)	Sectic Tank/Drain Field
Basin rearrhen, below-grade unlined:	injection Well .
Basin 'concrete, above-grace lined'	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank isub-surface storage
Basir concrete, below-grace lined	Tank sourface processings
Basin (concrete, below-grace unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (linec)	Drum Storage Area Topen:
Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controllec Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	X Other (specify will be placed in bags and wet down prior to off-site
Landfill (other)	disposal.

ATTACHMENT E



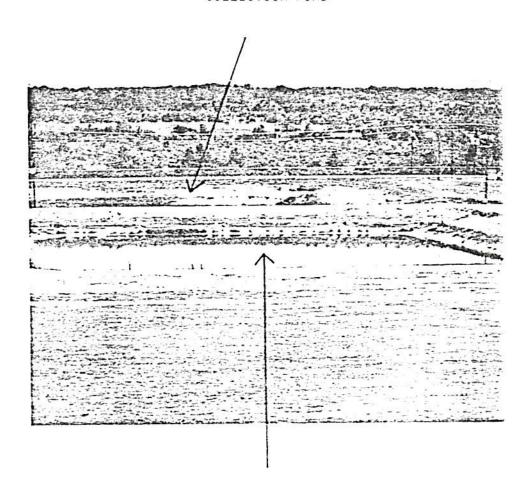


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ATTACHMENT F

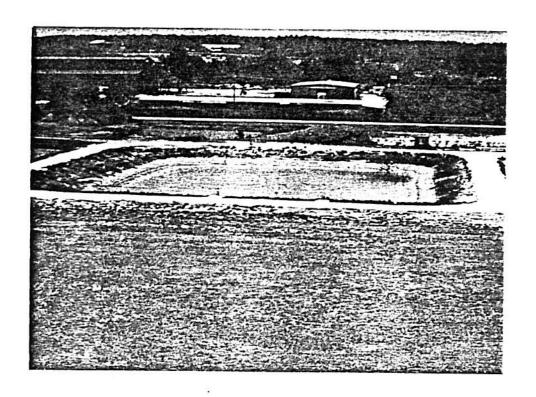
. F. WHARTON GENERATING STATIO

METAL CLEANING ORGANIC ACIDS COLLECTION POND

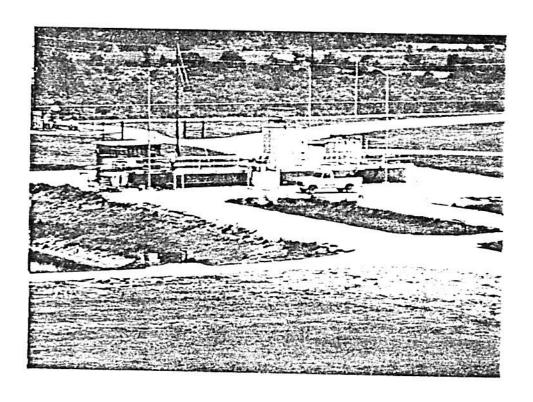


METAL CLEANING INORGANIC ACIDS COLLECTION POND

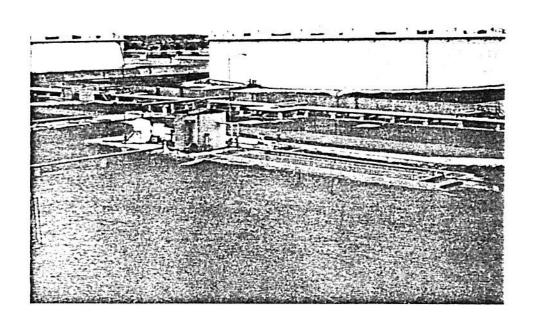
#### T. H. WHARTON GENERATING STATION



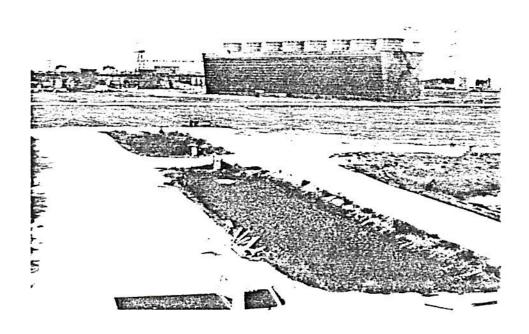
DEMINERALIZER REGENERANT COLLECTION POND



CHEMICAL WASTE TREATMENT SYSTEM



WASTE OIL & SLUDGE COLLECTION FACILITY



SAND DRYING BEDS

ATTACHMENT G

	Part A, Permit Process Internal Che	ckl ist	, PONE	K
ID Number _	TXD000837351 Inst Name T.H. WHA RTO			
Refer to	PHASE ONE	Indicate your ini	(i)(1).701 <del>-7</del> 1	Valid Prmlg
Form No:	Interim Regulatory Requirements	Yes		Date?
1	T/S/D'Facility? (If No, return to respondent.)	MS	·	\$ 00 M
3.	Form 1 received?	Ms		
1	Form 3 received?	ms		8
1 & 3	Postmarked on or before November 19, 1980?	ms	<del></del> -	<del></del>
3	Date of operation entered?	Ms		
3	Date of operation on or before November 19, 1980?	m5		
Notif. record	Notifier?	<u>ms</u>	-	41
n ccord	Notified on or before August 18, 1980?	ms		
1	Form 1, XIII B signed?	<u>ms</u>		
3	Form 3, IX B Signed?	ms		•
	items above are initialed in the Yes column, generated and indicate the trigger date here:	ate Interi	m Status ) }	
	PHASE TWO	*	•	5 <del>-</del> 3
1 .	Unsure if regulated or non-regulated?		GT	¥.
3	New facility?		GT	
1 & 3	Core items missing? If Yes, indicate which items:			
	Facility name; location; mail address; ope	erator inf	o;	8
,	certification; process info; waste info; o	wner;	sigs	¥
	PHASE THREE			
1 & 3	Non-core items missing? If Yes, indicate which ite	ems:		
•	Maps; photos; drawings; lat/long			*
	Other observations and comments:			
		Received	Date Stam	P
		80-	11-19	
Log out/Log	in .	00	*	

(Stamp forms also)

on reverse side.

ese print or type in the unshaded areas online in areas are spaced for elite type, i.e., 12					Form Approved OMB No. 15	8-R0	175			
FORM	S. ENVIRONMENTAL PROTECTION AGENCY I. EPA I.D. NUMBER									
1 SEPA	GENERAL INFORMATION  Consolidated Permits Program  (Read the "General Instructions" before starting.)									
LABEL ITEMS	1111	//	111	11111	If a preprinted label has be	en p	ovide	ed, affix		
I. EPA I.D. NUMBER	1///	//	///		it in the designated space. If ation carefully; if any of it	Review is in	v the	inform- ct, cross		
III. FACILITY NAME	11/1	//	1/1		through it and enter the cappropriate fill—in area belothe preprinted data is absent	w. A	Iso, i	f any of		
V. FACILITY MAILING ADDRESS	LEASE PLA	CE LA	BEL IN	THIS SPACE	left of the label space list that should appear), please proper fill—in area(s) below	prov	info ride it the	t in the label is		
111111111	///	//	//	111111	complete and correct, you Items I, III, V, and VI (e	xcept	VI-L	B which		
VI FACILITY	111,	//	//		must be completed regardi	provi	ded. I	Refer to		
LOCATION	111,	//	//		the instructions for detail tions and for the legal au	thori	zation	aescrip-		
111111111	111,	11	11.	111111	which this data is collected.	Since		Para series		
II. POLLUTANT CHARACTERISTICS	SALAR SALAR		No. of Lot	A transfer of the continue of	forms to the EDA. If you are	uor "	10e" +	0.201		
INSTRUCTIONS: Complete A through J questions, you must submit this form and	the supplementa	I form I	isted in the	e parenthesis following the ques	stion. Mark "X" in the box in 1	ne tn	ira co	nmuic		
if the supplemental form is attached. If y is excluded from permit requirements; see	ou answer "no" t	o each o	uestion, v	ou need not submit any of thes	e forms. You may answer "no	IT Y	our ac	tivity		
is excluded from permit requirements; see	Section C of the I		K'X'	o, section of the histractions	Tor definitions of bold—races		MAR			
SPECIFIC QUESTIONS		YES NO	FORM	SPECIFIC Q		YES	NO	ATTACHE		
A. Is this facility a publicly owned to which results in a discharge to water (FORM 2A)		Х		B. Does or will this facility include a concentrated a aquatic animal production discharge to waters of the	nimal feeding operation or n facility which results in a	19	χ			
C. Is this a facility which currently resulto waters of the U.S. other than tho		16 17	10	D. Is this a proposed facility			Х			
A or B above? (FORM 2C)	se described in	X 23	24	waters of the U.S.? (FOR!	M 2D)	25	26	27		
E. Does or will this facility treat, store hazardous wastes? (FORM 3)	, or dispose of	X 28 29	X	municipal effluent below	the lowermost stratum con- rter mile of the well bore,	31	χ	33		
G. Do you or will you inject at this facilit water or other fluids which are brough	y any produced at to the surface			H. Do you or will you inject	at this facility fluids for spe-					
in connection with conventional oil or duction, inject fluids used for enhance oil or natural gas, or inject fluids for s hydrocarbons? (FORM 4)	natural gas pro-	X		process, solution mining	ining of sulfur by the Frasch of minerals, in situ combus- overy of geothermal energy?	37	Х	39		
Is this facility a proposed stationary     one of the 28 industrial categories i	source which is	34 38	,,,	NOT one of the 28 indu	d stationary source which is strial categories listed in the					
structions and which will potentially per year of any air pollutant regul	emit 100 tons	1		instructions and which w	rill potentially emit 250 tons ant regulated under the Clean					
Clean Air Act and may affect or be attainment area? (FORM 5)	e located in an	X 40 41	42	Air Act and may affect of area? (FORM 5)	r be located in an attainment	43	X 44	45		
III. NAME OF FACILITY				Company of the Compan						
1 SKIP T. H. WHART	0 N G E 1	N E R	ATI	N.G. S.T.A.T.I.O.	N					
IV. FACILITY CONTACT										
A. NAME &	TITLE (last, firs	t, & title	)	В.	PHONE (area code & no.)					
2 M.c.G.U.I.R.E., WF.	. M.A.N.	A G E	R E	N V I R O N 7 1	3 4 8 1 7 1 4 5					
V. FACILITY MAILING ADDRESS				45 46 -	41   49 - 51   52 - 55					
A. 51	FREET OR P.O. B									
3 P.O. B.O.X. 1.7.0.0.	<u> </u>		<u> </u>							
15 16 B. CITY O				C.STATE D. ZIP COD						
4 H.O.U.S.T.O.N		1 1		T X 7 7 0 0						
VI. FACILITY LOCATION	A STATE OF THE STA									
A. STREET, ROUTE N	O. OR OTHER SE	ECIFIC	IDENTIF	ER	181		4			
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B. COUNTY				45)	1411	UOU	11			
H.A.R.R.I.S.		11					1	**		
C. CITY O	R TOWN			D.STATE E. ZIP COL	E F. COUNTY CODE					
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FORM	HAZARDOUS WASTE PERMIT APPLICATION  Consolidated Permits Program  (This information is required under Section 3005 of RCRA.)														NUMBER 0 0 0 8	7	7	3 5	1	7/A C 3 1
FOR OF	OR OFFICIAL USE ONLY																			
APPRO		(yr., mo., & day)										co	MMENTS							
A		801119																		
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revised ap	plicat	the appropriate box ion. If this is your f per in Item I above.	in A o	r B below (ma lication and y	rk or ou al	e box	kno	ow yo	o indi our fa	cate v	vhe 's E	PA I.D	is is the first a D. Number, or	application you if this is a revise	are submitti ed applicatio	ng foi n, ent	ter y	our	facility	or a ty's
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B. REV	ISED	APPLICATION (			nd co	mple	te I	tem 1	abou	re)				2. FACILI	TY HAS A I	RCRA	PE	RMI	т	
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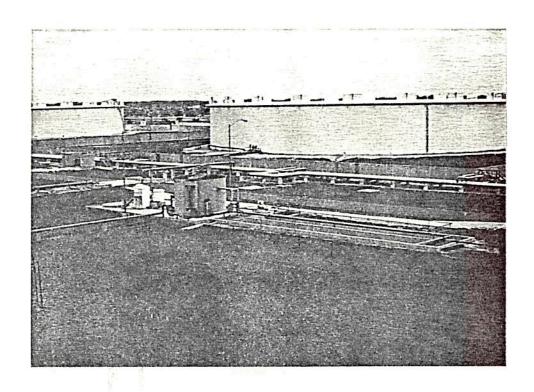
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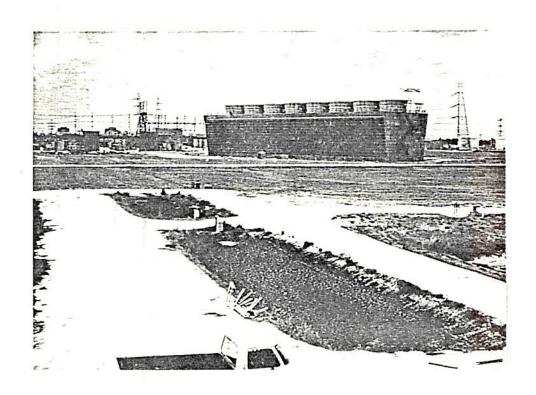
1770 Form Approved OMB No. 158-S80004

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T. H. WHARTON GENERATING STATION

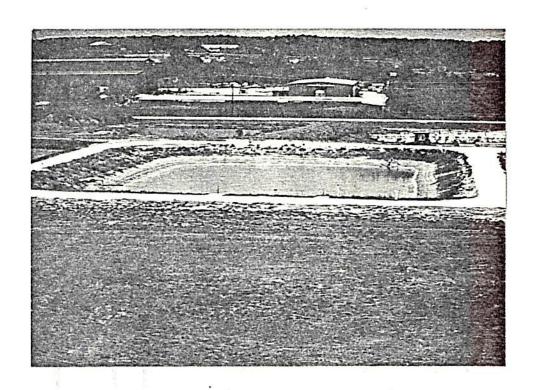


WASTE OIL & SLUDGE COLLECTION FACILITY

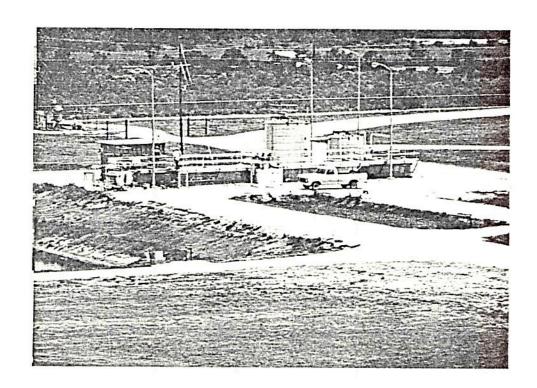


SAND DRYING BEDS

T. H. WHARTON GENERATING STATION

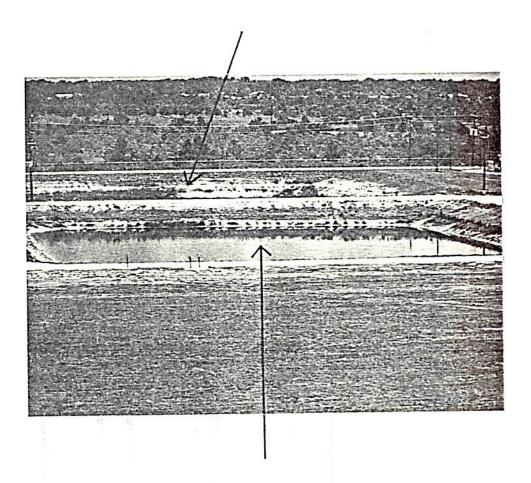


DEMINERALIZER REGENERANT COLLECTION POND



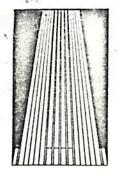
CHEMICAL WASTE TREATMENT SYSTEM

METAL CLEANING ORGANIC ACIDS COLLECTION POND



METAL CLEANING INORGANIC ACIDS COLLECTION POND

0 1 1 0 1000



Houston C Lighting & Power Company

Electric Tower P.O. Box 1700 Houston, Texas 77001

November 19, 1980

EPA Region VI Attn: 6 AEP First International Bldg. 1201 Elm Street Dallas, Texas 75270

SUBJECT: Submittal of Part A (Forms 1 and 3) of the Application for EPA Hazardous Waste Permit.

Pursuant to Section 3001 notification requirements under the Resource Conservation and Recovery Act, Houston Lighting and Power Company is enclosing the following <u>sixteen (16)</u> Part A applications:

-Allens Creek Nuclear Generating Station

-S. R. Bertron Generating Station

- Cedar Bayou Generating Station

-H. O. Clarke Generating Station

-Deepwater Generating Station

- Energy Development Complex

- Gable Street Generating Station

-Greens Bayou Generating Station

Limestone Generating Station

W. A. Parish Generating Station

.P. H. Robinson Generating Station

-South Houston Facility

South Texas Nuclear Generating Station

- Underground Service Center

-Webster Generating Station

7. H. Wharton Generating Station

Should you have any further questions, please do not hesitate to call me at (713) 481-7145.

NOV 1 9 1980

Sincerely,

W. F. McGuire, Manager

Environmental Protection Department

RECEIVED

0000837351

NOV 1 9 1980

6AEP

BCN/dhj

Enclosures

end

11-19-80

Continued from the front.			-
IV. DESCRIPTION OF HAZARDOUS WASTES	(tinued)		
E. USE THIS SPACE TO LIST ADDITIONAL PRO	CESS CODES FROM ITEM D(1) ON PAGE 3.		
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EPA I.D. NO. (enter from page 1)			
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1 2 - 13 14 15			
V. FACILITY DRAWING			
All existing facilities must include in the space provided on VI. PHOTOGRAPHS	page 5 a scale drawing of the facility (see instructions for	more detain. FG: 1755	
		structures existing stor	
All existing facilities must include photographs (aeri treatment and disposal areas; and sites of future stores)	rage, treatment or disposal areas (see instructions f	for more detail). F4: A	age,
VII. FACILITY GEOGRAPHIC LOCATION			50
	) LONGITUDE (da	egrees, minutes, & seconds)	
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Continued	from	the	front.	
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III. PROCESSES (continued) C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

### IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

CODE ENGLISH UNIT OF MEASURE METRIC UNIT OF MEASURE KILOGRAMS.....K 

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

### D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

  2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV** (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

1.1	A. EPA	10 000 A 10 000	C. UNIT		D. PROCESSES
LINE NO.	HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	SURE (enter code)	1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
Xt	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Please print or ty	pe in the unshaded a	areas only e, i.e., 12 racters/i	nch).							Form Approved OMB No. 158-S80004
FORM	EDA	HAZARDOUS	WAST							
RCRA	CFA	(This informatio	onsolidate n is require				05	of F	CRA.)	FTXD00083735131
FOR OFFICIA	L USE ONLY	是是100000000000000000000000000000000000								
APPROVED	(yr., mo., & day)							-	ОММЕ	ENTS
4 23	8011119									
	REVISED APPLI		rk one hox	only) to	indi	cate w	het	her	this is t	the first application you are submitting for your facility or a
revised application EPA I.D. Number	on. If this is your fir er in Item I above.	st application and yo	u already	know yo	ur fac	cility's	s EF	AI	D. Nu	mber, or if this is a revised application, enter your facility's
	TING FACILITY (S	an "X" below and p see instructions for de Complete item below.	efinition o							2.NEW FACILITY (Complete item below.) FOR NEW FACILITIES.
8 5 8	OPER	EXISTING FACILIT RATION BEGAN OR he boxes to the left)	THE DAT	VIDE TH	TRU	ATE (	yr.,	mo	, & day	TION BEGAN OR IS
15 73 74 77	5 76 77 78	lace an "X" below as	nd comple	e Item I	abov	e)				73 74 75 76 77 78 EXPECTED TO BEGIN
1. FAC	ILITY HAS INTERI	M STATUS								2. FACILITY HAS A RCRA PERMIT
		D DESIGN CAPA		balance	het I	004		har	oach -	vecces to be used at the facility. Tan lines are provided for
entering cod	es. If more lines are	de from the list of pr needed, enter the co design capacity) in	de(s) in the	space pi	rovid	ed. If	ap	roce	ess will	process to be used at the facility. Ten lines are provided for libe used that is not included in the list of codes below, then
		- For each code ente	red in colu	ımn A en	ter th	he cap	pacit	y o	the p	rocess.
2. UNIT OF	T — Enter the amount MEASURE — For e	each amount entered of measure that are	in column	B(1), en	ter th	e cod	e fr	om	the list	t of unit measure codes below that describes the unit of
measure		PRO- APPROPRI	ATE UNI	TS OF	DC U.	Jou.				PRO- APPROPRIATE UNITS OF
PR		CESS MEASURE CODE DESIGN	CAPACI						PROCE	CESS MEASURE FOR PROCESS ESS CODE DESIGN CAPACITY
Storage: CONTAINER	(barrel, drum, etc.)	SOI GALLONS				TAN		nt:		T01 GALLONS PER DAY OR
TANK WASTE PILE		S02 GALLONS C S03 CUBIC YAR CUBIC MET	DS OR ERS							LITERS PER DAY  TO2 GALLONS PER DAY OR  LITERS PER DAY
SURFACE IM Disposal:	POUNDMENT	S04 GALLONS	OR LITER	S		INCI	NE	RA	OR	T03 TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR
INJECTION V	VELL	D79 GALLONS C D80 ACRE-FEET would cover	(the volu	ne that		OTH	ER	(Us	e for p	chysical, chemical, T04 GALLONS PER DAY OR cal treatment LITERS PER DAY
LAND APPLI	CATION	depth of one HECTARE-N D81 ACRES OR	foot) OR			proce	esse ice i	s no	undme	rring in tanks, ents or inciner- e processes in
OCEAN DISP		D82 GALLONS F LITERS PER D83 GALLONS O	RDAY	OR		the s	pac	pr	ovided	; Item III-C.)
SORFACEIM	FOONDMENT	UNIT OF							UNIT	
UNIT OF ME	ASURE	CODE	UNIT OF						COD	DE UNIT OF MEASURE CODE
LITERS	<u>:</u> :::::::::::::::::::::::::::::::::::	L	TONS PE METRIC	RHOUP	₹					HECTARE-METERF
CUBIC METE	RS	c	GALLON	SPERH	OUF	2			E	HECTARESQ
example For	R COMPLETING ITE	EM III (shown in line ility also has an incin	numbers 2	(-1 and can burn	X-2 b	elow, to 20	gall	fac	ility ha	as two storage tanks, one tank can hold 200 gallons and the
s C	DUP	1 1	111	1	1	1	1	1	1	
□ A. PRO-	B. PROCESS	DESIGN CAPACI	TY			œ	A.	PR	2	B. PROCESS DESIGN CAPACITY
CESS	1. AM	DUNT	2. UNIT	OFFIC USI	IAL	BE	CC	ESS OD	E	2. UNIT OF MEA.  1. AMOUNT USE
UN (from list above)	(spec		(enter code)	ONL		LINE		ove		SURE OSE (enter code)
X-1 S 0 2	600	27	28 G	29 -	32	5		0		24,000.000 U 29 32
X-2 T 0 3	26		E			6	S	0	2	3,000.000 G
1 S 0 4	6,000,000	0.000	G			7	Ŧ			1,440,000
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3 T 0 1	1, 699, 200		u			9			1	1,800 G
4 -5 0 4	4,500,000		G			10	S	0	1 Un	nknown, small amount
16 - 18		27	28	29 -	32		16	-	18 19	- 27 28 29 - 32

CONTINUED FROM THE FRONT VII. SIC CODES (4-digit, in order of priority)	
A. FIRST	B. SECOND
7 4, 9, 1, 1 STEAM ELECTRIC POWER	c       (specify)
15   16 - 19	15 16 - 19
C. THIRD	D. FOURTH
13 16 - 19	7
VIII. OPERATOR INFORMATION	AND THE STANDARD STAN
A. NAME	B. Is the name listed in Item VIII-A also the
BHOUSTON LIGHTING & POWE	R COMPANY XX YES NO
15 16	55 66
C. STATUS OF OPERATOR (Enter the appropriate letter into the ans	
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify)	(specify) A 7.1.3 4.8.1 7.1.4.5
P = PRIVATE  E. STREET OR P.O. BOX	15 16 - 18 19 - 21 22 - 29
	11111
P.O. B.O.X., 1.7.0.0.	55
F, CITY OR TOWN	G.STATE H. ZIP CODE IX, INDIAN LAND  Is the facility located on Indian lands?
BHOUSTON	T X   7 7 0 0 1   YES   X NO
15 16	40 41 42 47 - 51
X. EXISTING ENVIRONMENTAL PERMITS	<b>在在于人民的工程的基本的</b>
	ns from Proposed Sources)
9 N T X O O O 6 4 O 8 9 P	
15 16 17 18 - 30 15 16 17 18  B. UIC (Underground Injection of Fluids) E. OTH	ER (specify)
9 0 0 1 0 3	(specify)
15 16 17 18 - 30 15 16 17 18	TEXAS DEPT. OF WATER RESOURCES
	(specify)
9 R 15 16 17 18 - 30 15 16 17 13	- 30
XI. MAP	<b>《其图书》的复数形式。如此是《司马尔》,即为《司书》</b>
Attach to this application a topographic map of the area extending	to at least one mile beyond property bounderies. The map must show proposed intake and discharge structures, each of its hazardous waste
treatment, storage, or disposal facilities, and each well where it in	ects fluids underground. Include all springs, rivers and other surface
water bodies in the map area. See instructions for precise requirement	usASee Form 3 for hazardous waste facilities
XII. NATURE OF BUSINESS (provide a brief description)	三维总统的19世代及1965年2月15日,2015年2月15日,1965年2月15日,1965年
fii.	Λ
STEAM ELECTRIC POWER PRODUCTION F9	: A 51
STEAR ELECTRIC FOWER PRODUCTION	<b>3</b> /
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s	×
XIII. CERTIFICATION (see instructions)	Part Parade by the property of the parade of the parade
I certify under penalty of law that I have personally examined and	am familiar with the information submitted in this application and all
attachments and that, based on my inquiry of those persons im-	mediately responsible for obtaining the information contained in the mplete. I am aware that there are significant penalties for submitting
false information, including the possibility of fine and imprisonmen	t.
A. NAME & OFFICIAL TITLE (type or print)  B. SIGNA	TURE C. DATE SIGNED
R. M. McCUISTION	MM11 -+ 111200
VICE PRESIDENT  COMMENTS FOR OFFICIAL USE ONLY	1111 Luchan 11-10-00
e I I I I I I I I I I I I I I I I I I I	
C	55

ese print or type in the unshaded areas only in areas are spaced for elite type, i.e., 12	racters/inch)	AND DESCRIPTION OF THE PERSON	-		Form Approved OMB No. 1.	58-R0	175		
FORM CEDA	GENE	RA	LII	NFORM	ATION I. EPA I.D. NUMBER	-	-	T/A C	
GENERAL SEPA	Cor Read the "G	enero	ated I Ins	Permits Pr tructions"	before starting.)	79000	TOWNS.	7 3 D	
I. EPA I.D. NUMBER	111	//	1	11	If a preprinted label has b	If a preprinted label has been provided, affix it in the designated space. Review the inform-			
111111111	111	//	ation carefully; if any of it through it and enter the	is in	corre	ct, cross			
III. FACILITY NAME	111	//	1	1/1	appropriate fill—in area bet the preprinted data is abse	ow. A	Also, i	if any of	
V. FACILITY MAILING ADDRESS PLE	ASE PLA	CE	i Ai	BEL IN	THIS SPACE left of the label space list that should appear), please	ts the	info	ormation it in the	
111111111111	Jan 1 -	1	1	1	complete and correct, you	need	not c	complete	
	///	1	/	1/1	Items I, III, V, and VI ( must be completed regard items if no label has been	less).	Com	plete all	
VI. LOCATION	11,	/	/	11,	the instructions for deta tions and for the legal at	iled i	item	descrip-	
	11,	1	1	11,	which this data is collected.				
II. POLLUTANT CHARACTERISTICS					sub-it on result emplication forms to the EPA. If you are	wor "	voe" 1	to any	
questions you must submit this form and the	supplement	al for	m lis	ted in the	submit any permit application forms to the EPA. If you ans a parenthesis following the question. Mark "X" in the box in	the th	iira co	olumn	
if the supplemental form is attached. If you a	nswer "no" ion C of the	to ea	ch q ıctio	uestion, yours. See also	ou need not submit any of these forms. You may answer "no o, Section D of the instructions for definitions of bold—faced	terms	s.	ctivity	
SPECIFIC QUESTIONS			9999999	FORM ATTACHED	SPECIFIC QUESTIONS	YES	MAR	K 'X'	
A. Is this facility a publicly owned treatm	ent works	1.5.5		ATTACHED	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or			ATTACHED	
which results in a discharge to waters of (FORM 2A)	the U.S.?		χ		aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X		
C. Is this a facility which currently results in to waters of the U.S. other than those d	discharges	16 X	17	10	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to	19	χ	21	
A or B above? (FORM 2C)	escribed in	22	23	24	waters of the U.S.? (FORM 2D)  F. Do you or will you inject at this facility industrial or	25	26	27	
E. Does or will this facility treat, store, or hazardous wastes? (FORM 3)	dispose of			V	municipal effluent below the lowermost stratum con- taining, within one quarter mile of the well bore,		X		
G. Do you or will you inject at this facility an	v produced	X 28	29	30	underground sources of drinking water? (FORM 4)	31	32	33	
water or other fluids which are brought to in connection with conventional oil or nature	the surface				H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combus-			8	
duction, inject fluids used for enhanced r oil or natural gas, or inject fluids for stora	ecovery of		Χ		tion of fossil fuel, or recovery of geothermal energy? (FORM 4)		Х		
hydrocarbons? (FORM 4)  I. Is this facility a proposed stationary sour	ce which is	34	35	36	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the	37	38	39	
one of the 28 industrial categories listed structions and which will potentially emi per year of any air pollutant regulated	t 100 tons		100		instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean				
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IV. FACILITY CONTACT			nno		B. PHONE (area code & no.)				
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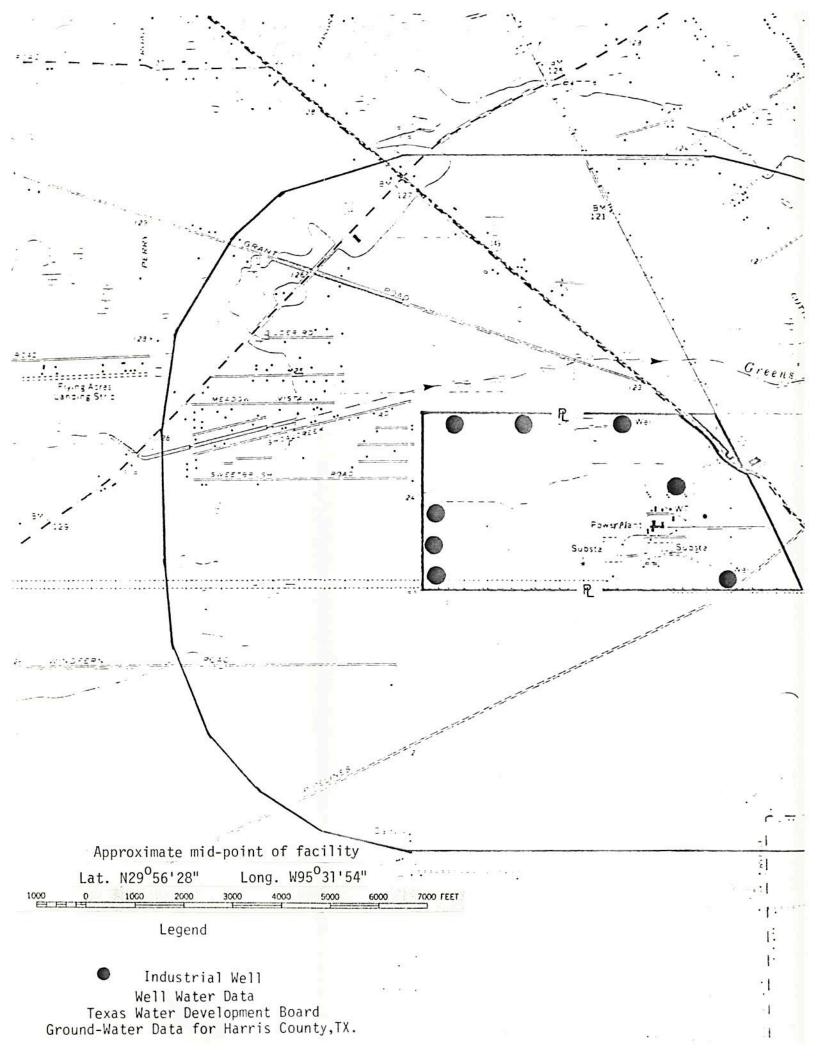
Part A, Permit Process -- Internal Checklist
Houston LIGHTING & POWER

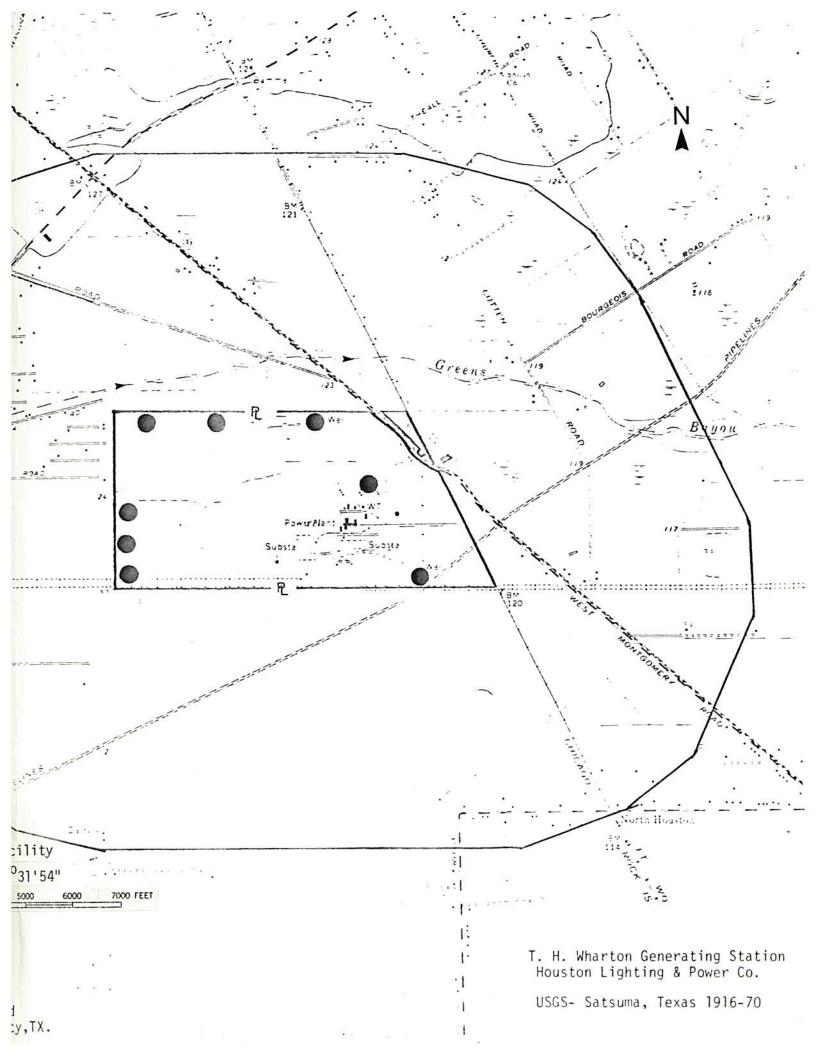
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Refer to	PHASE ONE	Indicate by Val	
Form No:	Interim Regulatory Requirements	your initials: Prm Yes No Dat	SSC(1) (1)
1	T/S/D'Facility? (If No, return to respondent.)	MS	
3.	Form 1 received?	<u>Ms</u>	
1	Form 3 received?	ms	:
1 & 3	Postmarked on or before November 19, 1980?	<u>ms</u>	
3	Date of operation entered?	M2	
3	Date of operation on or before November 19, 1980?	<u>ms</u>	_
Notif. record	Notifier?	<u>ms</u>	6
R COT G	Notified on or before August 18, 1980?	<u>ms</u>	취
1	Form 1, XIII B signed?	<u>ms</u>	
3	Form 3, IX B Signed?	<u>ms</u>	
	items above are initialed in the Yes column, genera ment and indicate the trigger date here:	te Interim Status	
	PHASE TWO	•	•
1 .	Unsure if regulated or non-regulated?	GT	85
3	New facility?	GT	
1 & 3	Core items missing? If Yes, indicate which items:		
	Facility name; location; mail address; ope	rator info;	
	<pre>certification; process info; waste info; o</pre>	wner; sigs	Ť.
	PHASE THREE		
1 & 3	Non-core items missing? If Yes, indicate which ite	ms:	
•	Maps; photos; drawings; lat/long		
	Other observations and comments:		
		Received Date Stamp	

Log out/Log in on reverse side.

(Stamp forms also)





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	whethe	r vol	need to	submit any permit application forms to the EPA. If you are	wer "V	es" t	n anv
questions, you must submit this form and the suppleme	ental for	rm lis	ted in the	e parenthesis following the question. Mark "X" in the box in	the thi	rd co	nmulo
if the supplemental form is attached. If you answer "no is excluded from permit requirements; see Section C of the	ne instru	uction	restron, y rs. See als	ou need not submit any of these forms. You may answer "no o, Section D of the instructions for definitions of <b>bold—faced</b>	terms	ur ac	uvity
SPECIFIC QUESTIONS	YES	MAR	PORM	SPECIFIC QUESTIONS	YES	AAR	K 'X'
A. Is this facility a publicly owned treatment work	-		ATTACHED	B. Does or will this facility (either existing or proposed)			ATTACH
which results in a discharge to waters of the U.S. (FORM 2A)	?	х		Include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharge	5	m	18	D. Is this a proposed facility fother than those described	18	20 V	way 21
to waters of the U.S. other than those described in A or B above? (FORM 2C)		-0	- 7 <b>M</b> EE	in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	-(as-	X	- p
E. Does or will this facility treat, store, or dispose o	34.74	1	531037	F. Do you or will you inject at this facility industrial or municipal affluent below the lowermost stratum con-			
evaluation of the property of the	X	CBF :	X	staining, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	-91 y	X 34.	233
G. Do you or will you inject at this facility any produce water or other fluids which are brought to the surface				H. Do you or will you inject at this facility fluids for spe- cial processes such as mining of sulfur by the Frasch			
in connection with conventional oil or ristural gas pro- duction, inject fluids used for enhanced recovery o oil or natural gas, or inject fluids for storage of liqui-	f	x		process, solution mining of minerels, in situ combus- tion of fossil fuel, or recovery of geothermal energy?		x	
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IV. FACILITY CONTACT				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	***	5	
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EPA Form 3510-1 (6-80)			165.9	CONTIL	NUE C	N R	EVERS

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A. NPDES (Discharges to Surface Water)	D. PSD (Air Em	issions from Proposed	Sources)	
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MAP	ar and the same			
MAP	man of the area exten	ding to at least one r	nile beyond property bound	eries. The map must show
MAP Attach to this application a topographic he outline of the facility, the location of the facility is the location of the facility in the location of the facility is the location of the facilities and the facilities are disposed facilities.	map of the area extend of each of its existing	and proposed intaki it injects fluids und	e and discharge structures, e erground. Include all spring	ch of its nazartious waste , rivers and other surface
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EPA Form 3510-1 (6-80) REVERSE

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.S. ENVIRONMENTAL PROTECTION AGENCY

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Continued from the front.				1001	• •
III PROCESSES (continued)	Well transfer	11. 200 (10.00)			6 (B) (b) (c)
C. SPACE FOR ADDITIONAL PRO-	CESS CODES OR FOR DE	SCRIBING OTHER PROCE	SSES (code "TO4"). FOR EA	CH PROCESS ENTERED	DHERE
		Œ.			
	(in)				

TIT	DECCRIPTION	OF UATA	RDOUS WASTES
1 V	DESCRIPTION	UF DALA	KDOOD HV91F9

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	•	METRIC UNIT OF MEASURE	CODE
POUNDS	P		KILOGRAMS	K
TONS			METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

### D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hezardous wastes: For each characteristic or toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Weste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	Т	A. EPA		$\Box$	QUANTITY OF WASTE			UNIT						9.77					D. PROCESSES	
	HAZARD. WASTENO (enter code)			AR			D.	S	SURE (enter code)		. 1.1			PROCESS CODES (enter)					E, jiy	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	1	5	0	5	4	900	1,414		P	T	0	3	D	8	0	•		•		
X-2	1	7	0	0	2	400			P	T	0	3	D	8	0					
X-3	1	7	0	0	1	100	res fore		P	T	0	3	D	8	0			-		
X-4	1	D	0	0	2	ve e pe					1			1			a I Ř		m e	included with above

	EPA I.D. NUMBER (enter from page 1)						1 / 1		FOR OFFICIAL USE ONLY												
wŢ	x	ם	0	0	0837351	1	7	7	w			DUP	72	2 DUP							
IV.	$\overline{}$		none s	97	ON OF HAZARDOUS WAST	$\overline{}$			S (continued)							· ·					
LINE NO.	IH	457	AR TE	A D. NO de)		C.UNIT OF MEA- SURE (enter code)		A-	1. PROCESS CODES (enter)					2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
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8	D	0	0	0	57,050		Р		T 0 1	s o	2			listed to be compatible with State requirements							
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26						П		I		1 1		1-1									

Continued from the front.					-		
	HAZARDOUS WASTES (contin	nued)					FAR N
E. USE THIS SPACE T	O LIST ADDITIONAL PROCES	S CODES FROM	ITEM D(1) ON PAGE	3.			
3							
					9.5		
						38	
EPA I.D. NO. (ente	r from page 1)						
FTXDOO08	3 7 3 5 1 6						
112	13 (4 (2)			Selected 1988			
V. FACILITY DRAWII	include in the space provided on pag	e 5 a scale drawing	of the facility (see instruct	ions for more d	etail).		
VI. PHOTOGRAPHS	include in the space provided on pos			1000		S. 18 (18)	The state of the
All switching facilities m	oust include photographs (aerial	or around-level)	that clearly delineate a	ll existing stru	ctures; exi	sting stora	ige,
treatment and disposal	areas; and sites of future storag	e, treatment or di	sposal areas (see instruc	ctions for moi	e detail).		
VII. FACILITY GEOG							
	IDE (degrees, minutes, & seconds)		LONGIT	UDE (degrees,	ninutes, & s	econds)	2 B 3 C
1 Jan 14				953	1	4	
	2 9 5 6 2 8			72 - 74 73	76 77 -	79	
VIII. FACILITY OWN		HORNEY THE	STATE OF THE PARTY.				
A. If the facility own	ner is also the facility operator as list	ed in Section VIII o	n Form 1, "General Inform	nation", place a	n "X" in the	box to the	left and
A skip to Section I)	( below.						
B. If the facility own	ner is not the facility operator as liste	ed in Section VIII or	Form 1, complete the fo	llowing items:		8 W. H	
					2. PHON	E NO. fares	code & no.)
	1. NAME OF FACILIT	T'S LEGAL OWNE			1111	TTT	
É					لللا	البليا	
15 16		•	4. CITY OR TOWN		ST.	6. ZIP C	ODE
cl	REET OR P.O. BOX	<u>e</u>			ПT	$\Pi\Pi$	TT
F	~	G		49 41	니니	لللل	<u> </u>
IX. OWNER CERTIFI	CATION	42 12 16			MANUAL PROPERTY.	MALI PROPERTY	· 201号题图
IX. UWNER CERTIFI	of law that I have personally ex	amined and am fa	miliar with the inform	ation submitt	ed in this a	nd all atta	ched
documents and that h	seed on my inquiry of those ind.	ividuals immediat	elv responsible for opta	uning the into	rmation, i	Delleve ur	alure
submitted information	is true, accurate, and complete.	I am aware that t	there are significant per	nalties for sub	mitting fal	se informa	tion,
including the possibilit	ry of fine and imprisonment.						
A. NAME (print or type)		B. SIGNATURE			. DATE SI		
R. M. McCuis	stion	KUNI	1x 1 : 1 = 1	- •	11-18	3-80	0
Vice Preside		1.)14 140	1 Cust	~	, ,		
X. OPERATOR CERT	TFICATION		公司的证券的认为的	AND STATE	33.3	- MEKA	是 2010年10月1日
I samific under populti	of law that I have nersonally ex	amined and am f	amiliar with the inform	ation submitt	ed in this a	nd all atta	ched
desuments and that h	need on my inquiry of those ind	ividuals immediat	elv responsible for obta	uning the inic	irmation, i	Delleve UI	al life
submitted information	is true accurate and complete	I am aware that	there are significant per	natties for <b>s</b> ub	mitting fal	se intorma	tion,
I including the possibility	is true, accurate, and complete.						
mendaning the possion.	ry of fine and imprisonment.	<b>4</b> , 3	R 7				- S
A. NAME (print or type)	ty of fine and imprisonment.	B. SIGNATURE	R 7		C. DATE SI		.5

T.H. WHARTON GENERATING STATION (574.612 ACRES)



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI 1201 ELM STREET DALLAS, TEXAS 75270

July 20, 1981

Houston Light & Pwr-T.H. Wharton Generating Station

Attn: W.F. McGuire

P.O. Box 1700

Houston, Texas 77001

EPA ID NUMBER: TXD 00 083 7351

FACILITY LOCATION: 16301 West Montgomery Road

Houston, Texas

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from ... the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities and the types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please contact Dwight Corley at (214) 767-2765, or write Mail Code 6E-P, 1201 Elm Street, Dallas, Texas 75270.

Sincerely

Diana Dutton, Director Enforcement Division (6E)

cc: Texas Department of Water Resources

# CONDITIONS OF OPERATION DURING INTERIM STATUS

Date prepared: July 21, 1981

and operator of t Application. This	this facility submitted in Par s is not a determination by EP acceptable facility for treati	the information that the owner that A of the Hazardous Waste Permit A that this facility is an ng, storing or disposing of the
I. Facility name	e, location and EPA identifica	tion number:
Name:	Houston Light & Power-T.H.	Wharton Generating Station
Location:	16301 West Montgomery Road	
	Houston, Texas	
EPA ID No:	TXD 00 083 7351	
	e person(s) who must comply wi	er or operator of the facility th the requirements set forth
Owner's nam	ne: Houston Lighting & Powe	r Company
Operator's	name: Houston Lighting & Powe	r Company
following process	period of interim status, the ses for treating, storing or d capacities that are indicated	isposing of hazardous waste,
Process Cod		Unit of Measure
\$04	6,000,000.	Gallons
T01	1,699,200.	Gallons per day
T02	24,000.	Gallons per day
S02	3,000.	Gallons
S01	1,801.	Gallons
nazardous wastes		ous Waste Numbers, and/or
		11

EPA Region VI, Dallas, TX 75270 (214) 767-2765



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

### REGION VI

### 1201 ELM STREET DALLAS, TEXAS 75270

July 20, 1981

C# 10501

Houston Light & Pwr-T.H. Wharton Generating Station

Attn: W.F. McGuire

P.O. Box 1700

Houston, Texas 77001

EPA ID NUMBER: TXD 00 083 7351

FACILITY LOCATION: 16301 West Montgomery Road

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If you have any questions concerning this letter, please contact Dwight Corley at (214) 767-2765, or write Mail Code 6E-P, 1201 Elm Street, Dallas, Texas 75270.

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Diana Dutton, Director Enforcement Division (6E)

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# CONDITIONS OF OPERATION DURING INTERIM STATUS

Date prepared: July 21, 1981

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I. Facility name	e, location and EPA identifica	tion number:
Name:	Houston Light & Fower-T.H.	Wharton Generating Station
Location:	16301 West Montgomery Road	
	Houston, Texas	
EPA ID No:	TXD 00 083 7351	
II. EPA consider and therefore the in 40 CFR Parts 1	person(s) who must comply wi	er or operator of the facility th the requirements set forth
Owner's nam	e: Houston Lighting & Powe	r Company
Operator's	name: <u>Houston Lighting &amp; Powe</u>	r Company
following process	period of interim status, the es for treating, storing or d capacities that are indicated	isposing of hazardous waste,
Process Cod SO4	e Design Capacity Amount 6,000,000.	<u>Unit of Measure</u> <u>Gallons</u>
T01	1,699,200.	Gallons per day
T02	24,000.	Gallons per day
S02	3,000.	Gallons
S01	1,801.	Gallons
nazardous wastes n		ous Waste Numbers, and/or
	— — — — — — EDA Doc	aion VI Dallas TV 75270

EPA Region VI, Dallas, TX 75270 (214) 767-2765

Texas Department of Water Resources

# INTEROFFICE MEMORANDUM

то :	S. W. Registration # 3636 File (Existing/PAP Application # 1050)	DATE: 3/16/82
FROM :	RCRA Forms Consolidation Team	
SUBJECT:	Company: HLat Wharton S.	ta
Attached h	erewith please find the following document(s):	RECEIVED
	EPA 8700-12	MAR 16 1982
V	EPA 3510	CB\1DMK
	TDWR Part A	
	Other:	

These documents are being placed in this file until processing at a later date.

Confidential material associated with these documents (LS) IS NOT) being held in the solid waste section for review.

## HAZARDOUS WASTE ADMINISTRATIVE CHECK LIST

1.	Acti	ve Corporation	Yes	(	)	No	(	)
2.	Post	age Fee Present	Yes	(	1	No	(	)
3.		ature Page (Original) Signed by ropriate Person	Yes	(V	//	No	(	)
4.	Sign	ature Page Notarized	Yes	( )	/)	No	(	)
5.	Acce The	ptable List of Landowners and ir Addresses	Yes	(V	1	No	(	)
6.	Acce	ptable Map of Landowner Locations	Yes	( 4	1	No	(	)
7.		atory Attachments Identified on e 16	Yes	(	)	No	(	)
	a.	USGS Map	Yes	(1	5	No	(	)
	b.	Site Legal Description	Yes	( V	5	No	(	)
	с.	Hazardous Waste Facility Component Summary Sheet	Yes	( r	5	No	(	)
	d.	Facility Boundaries and Adjacent Waters Map	Yes	( <i>v</i>	5	No	(	)
	e.	Photographs	Yes	(	1	No	(	)
	f.	Process Flow Diagram/Description // /	Yes	( v	1	No	(	)
	g.	Copy of Lease if Site is not /// A Owned by Applicant	Yes	(	)	No	(	)
1,	Ho	uston Lighting and Power						
) J.	7	H Whorton . Hoton	. с	,H	10	5 D	(	
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ATTACHMENT A

"Part A Application Revisions"

### T. H. Wharton Generating Station

### Revised Part A Application

Appropriate tables/pages (attached) of the Part A application have been revised to reflect current hazardous waste management practices at T. H. Wharton Generating Station.

The Part A application prepared in August 1980 listed several wastes/facility components which have been removed in the revised Part A. These wastes/components are discussed below:

1. Demineralizer Regenerant Inorganic Sludge

This sludge accumulates at the bottom of the demineralizer impoundment from storage of demineralizer regenerant. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 241470).

2. Metal Cleaning and Other Inorganic Sludge

This sludge accumulates at the bottom of the inorganic impoundment from storage of hydrochloric acid boiler and equipment cleanings, and boiler blowdown. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 241210).

 Metal Cleaning Organic Acids/Metal Cleaning Organic Acids Collection Pond

This waste is generated from ammoniated citric acid or hydroxyacetic-formic acid boiler and equipment cleanings. It is stored in an impoundment prior to being injected in an energy-producing boiler for incineration. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 215290). The organic impoundment has, therefore, never received hazardous waste.

4. Metal Cleaning Organic Sludge

This sludge accumulates at the bottom of the organic impoundment. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 248990).

5. Chemical Waste Treatment Sludge/Chemical Waste Treatment System & Sand Drying Beds

A concrete chemical waste treatment system is used to treat demineralizer regenerant, inorganic metal cleaning waste (when produced), and boiler blowdown prior to NPDES discharge. The sludge which accumulates in the settling chamber of the treatment system is pumped to sand drying beds for dewatering and periodic off-site disposal. Based on EP toxicity analyses submitted to your office on February 23, 1981 (letter attached), this sludge has been declassified to a Class II waste (TWC 240540).

6. Waste Oil and Sludge/Waste Oil and Sludge Collection Facility

Oily sludge generated from the oily waste treatment system is classified as a Class I nonhazardous or Class II waste, depending on the amount of oil present in the sludge. The attached EP toxicity analyses of oily sludge indicate that no hazardous constituents are present.

7. Asbestos in Insulation

Insulation containing asbestos is classified as a Class I nonhazardous waste (TWC 170750). Asbestos, originally listed on the Part A application, has been delisted from the hazardous waste list (CFR 40.261).

# T. H. Wharton Generating Station

Table III-I Generated Hazardous Wastes and Management Activities

Estimated

SIC	Code	pue	Process	Water 4911 - Treatment	Boiler & Con- 4911 - denser Clean1	4911 - Degreas	4911 - Painting				)	
1983 Annual	Quantity	Generated	(lbs)	4.66x108a	0 p	$0.01 \times 10^{3}$	0					
			Disposal									
Waste Management Activities –	(Check applicable items)	On-Site	Processing <sup>2</sup>	×	×	X						
—Waste Manag	(Check app		Storage	×	×	×	×					
		Off-Site	Disposal			×	×					
	EPA	Hazardous	Waste No.	D002	D002	D001	D001 F003, E005					
	EPA	Hazard	Code	O	O		LI					1
	TOWR	Waste Code	Number	902570	903070	910100	910110					
	TDWR	Sequence	Number	007	010	002	900					
	Verbal	Description	of Waste	Demineralizer Acid and Base Regeneration Wastewater	Inorganic Metal Cleaning Waste	Spent Solvents	Paint Thinner					

a Total quantity discharged from demineralizer impoundment under NPDES permit.

b Inorganic metal cleaning waste is generated infrequently. Quantity generated in 1980 was approximately 2.37x106 lbs.

<sup>1 &</sup>quot;Storage" means the interim containment or control of waste after generation and prior to ultimate disposal.

<sup>2 &</sup>quot;Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste so as to render such waste nonhazardous, safer for transport, amenable for recovery, amenable for storage, or reduced volume. The "transfer" of solid waste for reuse or disposal as used above, does not include the actions of a carrier in conveying or transporting solid waste by truck, ship, pipeline, or other means.

. H. Wharton Generating Statio.

Verbal Description of Waste	Demineralizer Acid and Base Regeneration Wastewater
· ·	
Process (see last column in Table III-I)	Water Treatment
TDWR Sequence Number of Waste (if assigned)	007, 008
want v 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
Indicate the facility components used for sto specified waste by entering the number of suc is managed.	
Lagoon/Pond (unlined)	Landfarm
1 Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin (concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	Other (specify
Landfill (other)	)

### H. Wharton Generating Station

Verbal Description of Waste	Cleaning Waste
Process (see last column in Table III-I)	Boiler & Condenser Cleaning
TDWR Sequence Number of Waste (if assigned)	010
Indicate the facility components used for sto specified waste by entering the number of suc is managed.	
Lagoon/Pond (unlined)	Landfarm
1 Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin_(concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	Other (specify
Landfill (other)	

.. H. Wharton Generating Station

Verbal Description of Waste	Spent Solvents
Process (see last column in Table III-I)	Degreasing
TDWR Sequence Number of Waste (if assigned)	005
Indicate the facility components used for stapecified waste by entering the number of suits managed.	
Lagoon/Pond (unlined)	Landfarm
Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin_(concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	1 Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
1 Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	1 Other (specify Mixed with
Landfill (other)	waste oil for pickup by a ) waste oil recycling firm
	Waste off lecycling lilm

## . H. Wharton Generating Statio

Verbal Description of Waste	Paint Thinner
Process (see last column in Table III-I)	Painting
TDWR Sequence Number of Waste (if assigned)	006
Indicate the facility components used for storage specified waste by entering the number of sucis managed.	
Lagoon/Pond (unlined)	Landfarm
Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin_(concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	1 Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	Other (specify
Landfill (other)	

# Table III-4 Hazardous Waste Facility Components List

Facility Component	ponent			Status			Design Capacity	λ,	Number of	Date
Name		Seq. No.	Inactive	Active	Proposed	(cn yds)	(Jeg)	(168)	Years	Servic 1974
Lagoon/Pond (lined)	1	0.1		×			1,000,000		10	1979. (relined
Verbal Description:	Clay 1:	Ined pond	Clay lined pond for the co	ollection of		alizer reg	demineralizer regeneration wastes prior to treatment	tes prior to	treatment.	
	Treated	l wastewat	er is disc	harged vi	Treated wastewater is discharged via NPDES permit.	rmit.				
Lagoon/Pond (lined)	1	02		×			1,000,000		10 19	1979 (Ifr
Verbal Description:	Clay li	ned pond	for the co	llection	of metal c	leaning in	Clay lined pond for the collection of metal cleaning inorganic acid wastes from boiler and	wastes from	boiler and	
equipment cleaning operations prior to treatment.	erations	prior to	treatment		ed wastewat	er is disc	Treated wastewater is discharged via NPDES permit.	DES permit.		
Boiler (Energy-producing)	ing)	03		×			NA		NA	VV
Verbal Description:	Spent	solvents	ire mixed v	rith waste	Spent solvents are mixed with waste oil prior to	to incine	incineration in the boiler.	boiler.		
			,	ŝ.						
Drum Storage Area		05		×			NA		7	1980
Verbal Description:	Drum st	orage are	Drum storage area for the	collectic	n of waste	paint thi	collection of waste paint thinner and spent solvents prior to	t solvents p	rior to	
	off-sit	off-site disposal.	17.							
	10	e								
Verbal Description:	· .				9	3.				
						-				
Verbal Description:										

### Attachment G

### T. H. Wharton Generating Station

### Process Description for Hazardous Waste Streams

### 1. Demineralizer Acid and Base Regeneration Wastewater (EPA Hazard Code C)

Demineralizer regenerant waste is collected in the demineralizer impoundment. The waste is then pumped to the chemical waste treatment system for pH adjustment and suspended solids removal. Treated wastewater is discharged in accordance with the NPDES permit.

### 2. Inorganic Metal Cleaning Waste (EPA Hazard Code C)

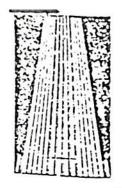
Inorganic metal cleaning waste is collected in the inorganic impoundment. The waste is then pumped to the chemical waste treatment system for pH adjustment, suspended solids and metals removal. Treated wastewater is discharged in accordance with the NPDES permit.

### 3. Spent Solvents (EPA Hazard Code I)

Spent solvents are collected in drums, mixed with waste oil for recycling, or incinerated in an energy-producing boiler.

### 4 Paint Thinner (EPA Hazard Coed I, T)

Paint thinner waste is collected in drums. These drums are temporarily stored prior to off-site disposal.



### Houston Lighting & Power Company

Electric Tower P.O. Box 1700 Houston Texas 77001

April 8, 1981

Mr. Jay Snow
Solid Waste Section
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Snow:

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATIONS

Pursuant to requirements set forth under RCRA, we have analyzed representative samples of the various waste streams and sludges generated at Houston Lighting & Power Company's generating stations. These waste streams and sludges were reported as being hazardous on our Part A, TDWR Hazardous Waste Registrations solely on the basis of Extraction Procedure (EP) Toxicity with the exception of metal cleaning inorganic acid waste, which was also listed on the basis of corrosivity, and demineralizer regenerant, which was listed only on the basis of corrosivity (See Attachment I).

The attached tables summarize the EP toxicity test results performed on each sample, including samples of demineralizer regenerant. The analyses were performed by our contract laboratory, Southern Petroleum Laboratories, and were done in accordance with the extraction procedures outlined by the EPA in Part 261, Appendix II of the Hazardous Waste Regulations. An attachment (Attachment II) has also been provided which identifies various abbreviations used in the summary tables to aid in your review.

The EP toxicity analytical data does not indicate the presence of toxic components in concentrations greater than the EP toxicity test limits. Therefore, as a result of our testing, we feel that those wastes previously considered hazardous due to EP toxicity should be declassified from the hazardous waste category.

It was stated above that two waste streams, demineralizer regenerant and metal cleaning inorganic acid wastes were listed as hazardous on the basis of corrosivity. The individual components that comprise each of these two waste streams when analyzed separately could result in pH values outside the specified range of the classification system. For example, if grab samples were taken of the cation and anion deminerlizer regeneration wastes, the cation wastes could exhibit low pH values, and the anion wastes could exhibit high pH values.

Houston Lighting & Power Company

Mr. Jay Snow April 8, 1981

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATIONS

However, a composite sample of all the demineralizer regeneration wastes, due to neutralization of the wastes, would be classified as simply solid wastes since the pH would fall between 2 and 12.5. The same type of example can be applied to metal cleaning inorganic acid waste as well, whereby the composite pH of the waste product would not qualify it as hazardous.

With respect to the corrosion of metals test to determine if a waste exhibits characteristics of corrosivity, many of the samples collected for EP toxicity analysis, including demineralizer regenerant and metal cleaning inorganic acid waste, were subjected to this test. The corrosivity analyses were performed in accordance with the test method specified in NACE (National Association of Corrosion Engineers) Standard TM-01-69 as standardized in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods." All samples indicated corrosion rates of less than 1 millimeter per year. This is substantially less than the 6.35 millimeter per year standard specified in the regulations.

It is also important to note that demineralizer regenerant and metal cleaning inorganic acid wastes are chemically treated and discharged under NPDES and TDWR wastewater discharge permits.

Considering the characteristics of demineralizer regenerant and metal cleaning inorganic acid waste described above and the corrosivity data, we do not feel that these two types of waste should be classified as hazardous waste prior to their treatment.

We therefore request declassification of all wastes specified in Attachment I. If you concur with our evaluation please notify us so that we can revise our Hazardous Waste Management program accordingly.

Sincerely,

W. F. McGuire, Manager

Environmental Protection Department

RTB/dhj

Attachments -

I. Waste Listing

II. Data Table Key

III. EP Toxicity Data Tables (six)

IV. Analytical Reports

### ATTACHMENT I

### HOUSTON LIGHTING & POWER COMPANY

### WASTE LISTINGS

WASTE DESCRIPTION	BASIS for LISTING AS HAZARDOUS
Demineralizer Regenerant	С
Demineralizer Regenerant Inorganic Sludge	E
Metal Cleaning Inorganic Acids	EC
Metal Cleaning Inorganic Sludge	Ε
Metal Cleaning Organic Acids	Е
Metal Cleaning Organic Sludge	E
C - Corrosive	

E - E.P. Toxicity

### ATTACHMENT II

### HOUSTON LIGHTING & POWER COMPANY

### DATA TABLE KEY

PLANT NAME	PLANT ABBREVIATION	TDWR SOLID WASTE REGISTRATION NO.
S. R. BERTRON	SRB .	31637
CEDAR BAYOU	CBY	31639
H. O. CLARKE	HOC	31635
DEEPWATER	DWP	31632
GREENS BAYOU	GBY	31634
W. A. PARISH -	WAP	31631
P. H. ROBINSON	PHR	31638
WEBSTER	WEB	31633
T. H. WHARTON	THW	31636

For some of the waste sampled there exists more than one set of data. This is due to one of two reasons; 1) sample collections representing different dates; 2) sample collections representing more than one storage/treatment facility for that particular type of waste. These samples are denoted by their direction relative to one another (N,S,E,W) or by number notation.



# CLOSURE PLAN FOR TWO HAZARDOUS WASTE SURFACE IMPOUNDMENTS AT THE T. H. WHARTON GENERATING STATION

For
Houston Lighting & Power Company
Houston, Texas

By Underground Resource Management, Inc. Austin, Texas

April, 1984



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OSURE PROCEDURE AND SCHEDULE	9
NAL CLOSURE OF THE IMPOUNDMENT SITES	2
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### PURPOSE OF CLOSURE PLAN

The T. H. Wharton Generating Station is currently classified as a hazardous waste generator/storer/treater/disposer under the Industrial Solid Waste Rules of the Texas Department of Water Resources (TDWR). The power plant generates two major waste streams which are classified as hazardous by State and Federal regulations: portions of the demineralizer waste regeneration and the hydrochloric acid phase of a boiler or condenser chemical cleaning when hydrochloric acid is used. Both waste streams are classified as corrosive and therefore hazardous because the pH of segments of these wastes may be less than 2 when the wastes are routed to the receiving surface impoundments. The waste streams in the surface impoundments are routed to a chemical waste treatment system for pH adjustment. The wastewaters are then discharged via the facility's permitted NPDES outfall.

Houston Lighting & Power (HL&P) plans to eliminate storage of hazardous wastes in the impoundments by constructing a concrete tank facility to receive all wastewater that could have a pH less than 2 or greater than 12.5. These wastewater streams will include the spent demineralizer regenerant, the hazardous portion of hydrochloric acid cleaning waste, and drains from the chemical waste treatment area and the plant laboratory sink.

Utilization of a concrete tank will meet the exemption requirements of EPA Interim Status Standards 40 CFR 265.1 Subpart A Purpose, Scope, and Applicability.

- [C] "The requirements of this part do not apply to:
  - [10] The owner or operator of an elementary neutralization



unit or a wastewater treatment unit as defined in §260.10 of this chapter."

Section 260.10 requires the unit to be constructed of non-earthen materials like concrete, to be self-supporting, and to be part of an NPDES-regulated discharge. The proposed unit will meet all regulatory criteria for exemption from RCRA requirements. Waste in the concrete tank will be treated in the chemical waste treatment system to bring the pH above 2. The treated wastewater will not be classified as hazardous and will meet the discharge criteria of the NPDES permit.

This closure plan is developed to meet the requirements of the 31 Texas Administrative Code (TAC) Section 335. Industrial Solid Waste (TDWR Chapter XXII); Subchapter N. Surface Impoundments as follows:

### "§ 335.286 Closure and Postclosure:

- a. At closure, the owner or operator may elect to remove from the impoundment:
  - 1. Standing liquids;
  - 2. Waste and waste residues;
  - 3. The liner, if any; and
  - 4. Underlying and surrounding contaminated soil;
- b. If the owner or operator removes all the impoundment materials listed in Subsection (a), or can demonstrate that none of the materials listed in Subsection (a) remaining at any stage of removal are hazardous wastes, the impoundment is not further subject to the requirements of this Subchapter."



### IMPOUNDMENT DESCRIPTION

The Wharton Generating Station currently uses two storage impoundments for low pH wastewater as shown on Figure 1. The demineralizer, or west impoundment, has approximate dimensions of 265 feet by 164 feet by 14.5 feet deep, with side slopes of 3 to 1. The dimensions of the inorganic metal cleaning impoundment are approximately 255 feet by 220 feet by 14.5 feet deep with side slopes of 3 to 1.

Both the demineralizer and the inorganic impoundments were constructed from 1973 to 1974. The demineralizer impoundment originally received demineralizer regenerant wastewater and boiler blowdown water. The inorganic impoundment originally received metal cleaning wastes from both organic and inorganic processes.

In 1979, a chemical waste treatment system was installed and a separate impoundment constructed for organic cleaning wastes. Boiler blowdown was rerouted from the demineralizer impoundment into the inorganic impoundment and the inorganic and demineralizer impoundments were relined with compacted natural clay.

The demineralizer impoundment currently receives demineralizer regenerant waste, rainwater runoff from the bermed area around the impoundment, and runoff from drains below the three demineralizer areas. The pH of these combined wastewaters averages about 2.2. A 300 gpm pump cycles water from this impoundment into the chemical waste treatment unit. If the treated wastewater pH meets NPDES standards, it is discharged; otherwise it is recycled to the impoundment. The inorganic impoundment receives boiler blowdown, inorganic boiler and condenser cleaning waste when produced, and drainage through a gravity pipe below the chemical waste treatment area. The last inorganic boiler cleaning



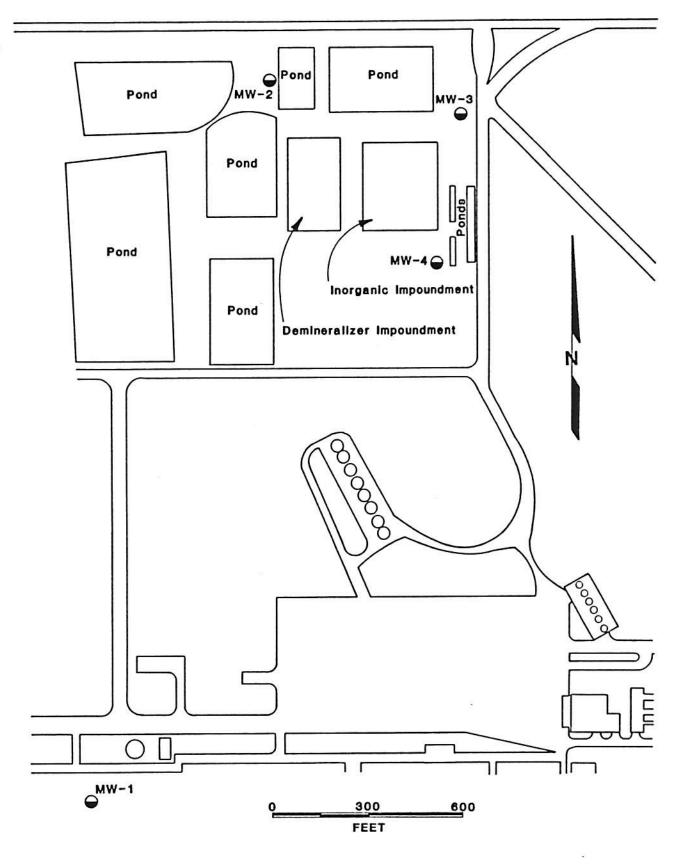


Figure 1. T.H. Wharton Generating Station, Site Plan.



was in September, 1980 and the last inorganic condenser cleaning in March, 1982. The typical pH for this impoundment is neutral to slightly alkaline, i.e. pH 7 to 8.

Since the water in the inorganic impoundment is usually near neutral, it is unlikely that the clay liner will exhibit a pH less than 2. The typical pH in the demineralizer impoundment is 2.2; therefore, the clay liner may require treatment with caustic to raise the pH.



### WASTE EVALUATION

Wastes which must be managed during the closure of the T.H. Wharton Generating Station demineralizer and inorganic impoundments are any wastewater inventory in the impoundments and any contaminated soil below the impoundments. Of these wastes, the one with hazardous characteristics is wastewater in the demineralizer impoundment with a corrosive pH less than 2. Tests will be conducted in the field to verify that the pH of water in the soils is non-corrosive. Results of these tests will be submitted to the TDWR.

Soil pore water below the inorganic impoundment is unlikely to exhibit a low pH. The last inorganic cleaning at this station was of condenser No. 4 in March, 1982. Boiler blowdown and rainwater currently in the impoundment exhibits a pH of 7 to 8, and the pH of retained water in the soil lining would likely be in equilibrium with water in the impoundment.

The clay liner of the demineralizer impoundment may exhibit a lower pH than that of the inorganic impoundment. Wastewater in the impoundment typically exhibits a pH of about 2.2. Preliminary measurements of a sample from this impoundment showed a pH of 3.78, and a dry soil sample from the bank of the demineralizer impoundment mixed with an equal mass of deionized water (according to ASA Part 60-3 standard method) had a pH of 3.56.

Since no wastes defined as EP toxic have been discharged to these impoundments, it is unlikely that the soils would exhibit the EP toxicity characteristics. This conclusion is supported by the sediment sample test data for all EP toxicity metallic constituents presented in Table 1. Similar data from other HL&P generating stations show little



TABLE 1

T. H. WHARTON IMPOUNDMENT SEDIMENT<sup>1</sup>

Constituent	EP Toxic Concentration <sup>2</sup> (mg/L)	Demineralizer Regenerant (mg/L)	Inorganic Metal Cleaning (mg/L)
Arsenic	5.0	<0.05	<0.05
Barium	100.0	11.9	10.7
Cadmium	1.0	<0.05	<0.05
Chromium	5.0	<0.05	<0.05
Lead	5.0	<0.1	<0.1
Mercury	0.2	<0.005	<0.005
Selenium	1.0	<0.05	<0.05
Silver	5.0	<0.05	<0.05
Endrin	0.02	<0.02	<0.02
Lindane	0.4	<0.4	<0.1
Methoxychlor	10.0	<1	<1
Toxaphene	0.5	<0.5	<0.5
Dichlorophenoxyacetic acid	10.0	<1	<1
Trichlorophenoxypropionic ac	id 1.0	<1	<1

 $<sup>^1\</sup>mathrm{Data}$  developed by HL&P as per RCRA waste analysis requirements. Material currently listed on TDWR registration as Class II.

 $<sup>^2\</sup>mathrm{Maximum}$  concentrations from 40 CFR 261; 48 FR 15256 - maximum concentration of contaminants for characteristic of EP toxicity.



variability, and all values are well below the concentration limits established for the EP toxicity test.

These assumptions regarding the impoundment lining characteristics will be tested. A field survey to map the pH of the clay liner soil water of each impoundment will be conducted by an independent consultant, Underground Resource Management, Inc., and the results will be submitted to TDWR as an addendum to the closure plan. The survey will consist of field measurements of the pH of surface soil water at 10 locations distributed across each of the impoundment bottoms. Where surface soil water pH is less than 2, core samples will be collected to map the depth of low pH soil water. Soils which are too dry to measure pore water pH directly will be prepared with deionized water according to the ASA Part 60-3 standard method.

Two laboratory samples from each impoundment will be collected during the field pH survey. These samples, one of the soil liner and one of the wastewater, will be tested according to standard Extraction Procedures (EP) defining toxicity. The results of these tests will also be submitted to the TDWR.



### CLOSURE PROCEDURE AND SCHEDULE

Closure of the inorganic surface impoundment at the T. H. Wharton Generating Station will begin on September 7, 1984 (subject to approval by TDWR) and will consist of these steps:

### Termination of Discharge into the Impoundment

Day from start: 1

Time to complete: 1 day

All discharge into the impoundment will cease. Pipes will be rerouted or removed, or blind flanges will be installed. Boiler blowdown will be rerouted into the demineralizer impoundment.

### Discharge of Wastewater

Day from start: 2

Time to complete: 7 days

Wastewater will be discharged from the impoundment to the wastewater treatment system as during normal operation. When the impoundment is gravity drained to 6 inches, a portable 4 horsepower gasoline pump will be used to pump the remaining water to the treatment system. Normally the impoundment is emptied in about two days. Seven days are allowed to operate during rainy weather and to allow discharge of water from bank storage.

### 3. Neutralizing the Soils (If Necessary)

Day from start: 9

Time to complete: 3 days

The location and total volume of soil requiring treatment will be determined by field sampling. If any soils require



treatment, the volume of lime required to neutralize the soil water will be calculated, and an outside contractor (not selected at this time) will apply lime and disk it into the soil to the lowest depth where soil water pH is less than 2. Preliminary laboratory tests on the clay liner suggest that an application rate of one pound of lime for 10 pounds of soil will raise the pH of the soil water to above 6. This application rate will be field tested. Necessary equipment provided by the contractor will be a vehicle capable of spreading the lime, disking the soil, and navigating the slopes into the bottom of the impoundment.

### 4. Final Soil Samples (If Necessary)

Day from start: 12

Time to complete: 1 day

If lime treatment of the soil as described in Step 3 is required, the original sampling sites where low pH soil water was measured will be resampled to verify that the final pH of the soil water was greater than 2 at all locations. This step will complete closure in compliance with 31 TAC, Section 335.286.

Once the inorganic impoundment is closed as a hazardous facility according to the preceding schedule, the concrete tank will be constructed in the approximate location of the inorganic impoundment. Following construction completion, demineralizer regenerant and boiler blowdown will be routed from the demineralizer impoundment to the new concrete tank. Work will then begin to close the demineralizer impoundment as a hazardous waste facility. The closure procedure for the demineralizer impoundment will be identical to that for the inorganic



impoundment with the exception of Step 3. If field sampling for pH dictates the necessity for clay liner neutralization, a caustic buffering solution of lime or sodium hydroxide at a pH of 9 will be added to fill the impoundment to a depth of approximately 0.5 feet. The buffering solution will remain in the impoundment for a minimum of 24 hours and then will be discharged to the wastewater treatment system. Following liquid caustic treatment, if resampling indicates that additional treatment is required, the clay liner will be limed and disked as described above in Step 3. Following liming and disking (if necessary), the liner will be resampled and recompacted for use of the impoundment as a nonhazardous facility.

The closure procedure described above has been developed assuming that any soil water which exhibits a pH of less than 2 will be limited to the shallow layer less than 1 foot below impoundment bottom. This assumption is supported by preliminary sediment analyses. An additional field survey of both impoundments will confirm these assumptions. If, however, pH values less than 2 persist at depths which make lime treatment and disking unfeasible, HL&P will remove the contaminated soil and dispose of it at a facility permitted to receive Class I materials. Following removal and additional sampling, liming and disking as described in Step 3 will be performed, if necessary.



### FINAL CLOSURE OF THE IMPOUNDMENT SITES

After closure, both impoundments at the T. H. Wharton Generating Station will have been dewatered, and any soil below the site in which soil moisture exhibited a pH less than 2 will have been neutralized or removed with verification of no remaining hazardous materials by a final set of tests. Once these steps are certified as complete by an independent registered professional engineer, HL&P will submit to the state for declassification of the impoundments as hazardous waste treatment, storage, and disposal facilities, and reclassification of the remaining impoundment as a Class II facility. The inorganic impoundment will no longer exist. The ground-water monitoring program will be discontinued, except as may be required by the Ground-water Quality Assessment Plan, since the Wharton Station will be a hazardous waste generator only. Due to the closure procedures utilized, no additional post closure monitoring will be required.

Future site uses planned for the impoundments are to use the inorganic impoundment as the site for the concrete tank and to use the current demineralizer impoundment as a Class II facility to store boiler blowdown and, when generated, the nonhazardous portion of boiler condenser cleanings when hydrochloric acid is used.

# The Light

Company Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

August 8, 1984

Mr. Allen L. Messenger, Head Disposal Facilities Unit Solid Waste Section Texas Department of Water Resources P. O. Box 13087, Capitol Station Austin, Texas 78711

Dear Mr. Messenger:

SUBJECT: T. H. WHARTON GENERATING STATION, TOWN NO. CLOSURE PLAN FOR HAZARDOUS WASTE SURFACE IMPOUNDMENTS

A closure plan for hazardous waste surface impoundments at this facility was submitted on April 16, 1984. A supplemental report, "Field Sampling and Laboratory Analysis of Hazardous Waste Surface Impoundments", was submitted on May 15, 1984, and provided additional information on the impoundment wastewaters and clay liners.

Your letter of June 26, 1984, discussed deficiencies in the closure plan and requested additional information for use in your evaluation. This information request was discussed with you and your staff by E. A. Feith and R. D. Groover (HL&P) in a meeting on July 6, 1984. This letter and attachments respond to your request and are intended to supplement and be made a part of the closure plan for hazardous waste surface impoundments at this facility.

Your expeditious review and response to the enclosed material will be appreciated. Please contact E. A. Feith (713) 922-2205 or R. D. Groover (713) 922-2195 if you have questions or desire to arrange a conference.

Sincerely,

McGuire, Manager

Environmental Protection Department

RDG/bwt

### SUPPLEMENT TO

# CLOSURE PLAN FOR TWO HAZARDOUS WASTE SURFACE IMPOUNDMENTS AT THE T. H. WHARTON GENERATING STATION

Houston Lighting & Power Company Houston, Texas

### REGULATORY CONSIDERATIONS

HL&P intends to close the two hazardous waste surface impoundments (demineralizer and inorganic impoundments) in accordance with 31 TAC 335.469 by demonstrating that all hazardous waste constituents have either been removed, are not present, or are neutralized during the closure process. The sampling programs and other information presented herein are designed to fulfill this demonstration. The summary of waste constituents presented in Table 2 indicates no need to sample for Appendix VIII constituents other than EP metals toxicity analyses for silver and barium. Based on data previously collected, it is believed that for EP metals toxicity analyses will reveal no hazardous levels in the clay liners. As a conservative measure, additional core samples of the clay liner will be collected, but not analyzed unless the EP metals toxicity analyses of surface samples indicate hazardous levels.

Finally, a degree of flexibility is factored into the closure plan whereby different steps will be taken based upon the analytical results obtained during closure. Potential scenarios and the corresponding action plans are presented in Table 1.

Although no problems are anticipated in achieving closure, in the event that all hazardous consitituents cannot be removed from the surface impoundment(s) or treated as specified in the closure plan, HL&P will notify the Executive Director (TDWR) that it is unable to certify compliance with the approved closure plan.

### SAMPLING AND ANALYSIS DURING CLOSURE

A sampling program of the two hazardous waste impoundments will be implemented during closure to determine the condition of the clay liners. The basic plan will include soil pH and EP metals toxicity measurements of the

# POTENTIAL SAMPLING RESULTS AND PROPOSED PLAN OF ACTION DURING CLOSURE

pH Measurements	pH Measurements of the Clay Liner	EP Metals Toxicity Measurements of the Clay Liner	its of the Clay Liner
Results	Action*	Results	Action
no surface values < 2.5	oneutralize (liming/disking) to pH 6-9; verify with field measurements	° no EP metals toxicity values at hazardous levels in surface samples	° no action required
surface values < 2.5; 6-in. core samples >2.5	oneutralize (liming/disking) to pH 6-9; verify with field core samples	e EP metals toxicity values are hazardous for one or more parameters in surface samples; no hazardous levels in 6-in core samples	<pre>° excavate top 6-in.; resample for EP metals toxicity to verify removal</pre>
surface values < 2.5; 6-in. core samples < 2.5	overify depth of < 2.5 pH with deeper cores; excavate to remove contaminated layer; neutralize (liming/disking) to pH 6-9; verify with field surface and core samples	° EP metals toxicity values are hazardous in both surface and 6-in. core samples	samples to determine depth to which hazardous levels are present; excavate to remove hazardous constituents; verify removal with addition samples analyzed fo 'P metals toxicity

For the existing demineralizer impoundment, neutralization will first be attempted with liquid sodium hydroxide solution. If unsuccessful, liming/disking and/or excavation will be conducted as outlined herein.

clay liner surface in each impoundment. Core samples will be taken and analyzed for pH at any location where surface pH measurements are found to be below 2.5 pH. If EP metals toxicity analyses indicate the presence of metals at hazardous levels, 6-inch core samples taken at the same location will be analyzed for EP metals toxicity. The depth of soil neutralization and/or soil excavation will be determined based on the results of the surface and core soil sampling.

The following is a description of the number of samples, sampling locations, parameters and analytical methodology.

### SAMPLING LOCATION/NUMBER OF SAMPLES

Each hazardous impoundment will be divided into four quadrants. From each quadrant, the following samples from the clay liner will be taken:

- 2 surface samples (pH)
- 1 surface sample (EP metals toxicity)
- 1 core sample (EP metals toxicity)

From the center of the impoundment the following samples will be taken:

- 2 surface samples (pH)
- 1 surface sample (EP metals toxicity)
- l core sample (EP metals toxicity)

Core samples for pH will only be taken where surface pH measurements are below 2.5.

### PARAMETERS

The parameters selected for analysis include pH and EP metals toxicity. No additional Appendix VIII or 40 CFR 261 compounds are included in the sampling program. As shown in Table 2, silver nitrate and barium chloride (spent laboratory reagents) are the only Appendix VIII or 40 CFR 261 compounds present in any of the waste streams entering the hazardous impoundments. Measurement of EP metals toxicity will address any silver or barium residues remaining in the clay liner of the impoundments.

### ANALYTICAL METHODOLOGY

The pH samples will be analyzed using a portable pH meter according to Section 150.1 of EPA Methods for the Analysis of Water and Wastewater EPA-6000/4-79-020.

EP metals toxicity samples will be analyzed according to Appendix II of 40 CFR.261.24.

### NEUTRALIZATION

If field measurements of pH indicate neutralization is necessary, the clay liner of the inorganic metal cleaning waste impoundment will be neutralized by lime disking to obtain a pH level between 6 and 9. It has been determined that disking will be effective to a depth of eight inches. If 6-inch core samples show pH in the clay liner to be below 2.5 at a depth greater than six inches, the clay liner will be excavated to a depth sufficient to remove the contaminated materials and the remaining clay liner will be neutralized by lime disking to a pH level between 6 and 9. The results will be verified with field surface and core samples.

A flexible approach will be utilized in the field for neutralization of the current demineralizer surface impoundment. An attempt will initially be made to neutralize this impoundment with liquid sodium hydroxide to a pH level in the clay liner of between 6 and 9. It is not feasible to calculate the quantity of buffering solution required to neutralize the clay liner. If surface and 6- inch core samples of the clay liner indicate that liquid sodium hydroxide does not completely neutralize the liner to the depth required, liming and disking procedures will be followed as described above. As mentioned previously, eight inches is deemed an effective depth to lime disk. Any area of contamination deeper than eight inches will require excavation followed by field verification of pH values in surface and core samples.

### DEMINERALIZER IMPOUNDMENT

As specified in the closure plan, the current demineralizer impoundment will, following closure, be used for boiler blowdown and, when generated, the nonhazardous portion of inorganic metal cleaning waste.

After the clay liner of the demineralizer impoundment has been neutralized and sampling verifies that the clay liner no longer contains hazardous constituents, soil permeability tests will be conducted to ensure proper recompaction of the clay liner. The permeability tests will be conducted with boiler blowdown water and will be used to demonstrate that the recompacted clay liner meets the guidelines for a Class II surface impoundment (TDWR Technical Guideline No.4).

### WASTES ENTERING EACH IMPOUNDMENT

Table 2 lists the waste streams and volumes entering each impoundment and the chemical constituents of each waste stream. Based on a comparison of the process waste streams and their respective components to Appendix VIII and 40 CFR 261, pH and EP metals toxicity analyses are deemed sufficient to characterize the underlying clay liner of the impoundments.

### TDWR PART A APPLICATION REVISION

The following sections of the Part A application have been updated and are shown in Attachment A.

Table III-1	Generated Hazardous Wastes and Management Activities
Table III-2	Hazardous Waste Management Facility Component Summary
	Sheets
Table III-4	Hazardous Waste Facilities Components List
Attachment G	Process Description for Hazardous Waste Streams

These revised sections accurately designate all current hazardous waste management units and hazardous wastes at the generating station.

The status of the remaining wastes/facility components listed in the original Part A, but no addressed in the closure plan, are also discussed in Attachment A. This discussion demonstrates that, after closure of the hazardous waste impoundments, waste management activities at the facility will not be subject to Part B permitting requirments.

### CLASSIFICATION OF TANK

The concrete tank which will be built following closure of the hazardous waste surface impoundments will be a "wastewater treatment unit" as defined in 31 TAC Section 335.45. According to this definition, the tank will be subject to Section 402 or Section 307 (b) of the Federal Water Pollution Control Act as ammended (33 USC 466 et seq.) and, therefore, can receive laboratory wastes. The tank will be exempt from solid waste permitting requirements under 31 TAC 335.41 (d)(1).

### GROUNDWATER MONITORING

Results of groundwater quality assessment studies and future groundwater monitoring requirements were discussed with Mr. Paul Lewis, Enforcement and Field Operations Division, on July 25, 1984. It was agreed with Mr. Lewis that semiannual groundwater monitoring will be resumed with a sampling event conducted prior to November 19, 1984. An annual report, consisting of the groundwater data and appropriate statistical analysis, will be submitted shortly thereafter. Based on the data presented in the groundwater quality assessment study report and HL&P's intent to close the impoundments in accordance with 31 TAC 335.469 (a) (1), Mr. Lewis verified that post-closure groundwater monitoring will not be required at this facility. The monitoring wells will, however, be maintained in a functional condition.

### NOTIFICATION

The following notifications will be made to Mr. Merton Coloton, Supervisor, TDWR, District 7:

- 1) The date closure will begin for each impoundment; and
- 2) The date semiannual groundwater sampling will be conducted.

This information will be provided in the event that observation and/or sampling coordination are desired by District 7 personnel.

### CERTIFICATION

Sampling and closure certification of the impoundments will be conducted by an independent consulting firm. A registered professional engineer from this firm will certify that the impoundments have been closed in accordance with the specifications in the approved closure plan. This written certification will be submitted to TDWR.

### TABLE 2

### T. H. WHARTON

### DEMINERALIZER IMPOUNDMENT

WASTE STREAM	CONSTITUENTS	APPROX. ANNUAL VOLUME (1983) (GALLONS)
1) DEMINERALIZER REGENE	RANT 2-4% H <sub>2</sub> SO <sub>2</sub> AND/OR 6-8% NaOH REGENERATION RINSES RAINWATER POSSIBLY TRACE AMOUNTS OF THE FOLLOWING: CALCIUM SULFATE CHLORIDE IRON SILICA MAGNESIUM SODIUM COPPER	55,863,000*
2) ACID/CAUSTIC DRAINS (STORAGE TANKS AND DEMINERALIZER BUILDI	H <sub>2</sub> SO <sub>4</sub> NaOH NG) RAINWATER	UNKNOWN, VARIES WITH RAINFALL AND SPILLAGE
3) PLANT LABORATORY DRA	IN	4,044.5 GALLONS** + 27 LBS (SOLID)
ANALYSIS	REAGENTS	VOLUME/YEAR (MLS)
DISSOLVED OXYGEN	INDIGO CARMINE INDICATOR (5,5'-INDIGODISULFONIC ACID)	2,200
	GLYCERINE 33.3% POTASSIUM HYDROXIDE	2,600 800
SILICA	(1:1) HYDROCHLORIC ACID 10% AMMONIUM MOLYBDATE 10% OXALIC ACID AMINO REDUCING AGENT (1-AMINO-2-NAPTHOL-4-SULFONIC ACID IN SOLDIUM SULFITE AND	1,100 2,100 2,100 1,100
	SODIUM META-BISULFITE)	

<sup>\*</sup> TOTAL QUANTITY DISCHARGED FROM DEMINERALIZER IMPOUNDMENT UNDER NPDES. REPRESENTS A TOTAL FOR ALL WASTE STREAMS LISTED HEREIN.

<sup>\*\*</sup> ONLY 44.5 GALLONS OF THIS TOTAL CONSISTS OF REAGENTS.

ANALYSIS	REAGENTS	VOLUME/YEAR (MLS)
ALKALINITY	PHENOLPHTHALEIN INDICATOR (DISSOLVED IN ETHANOL) METHYL RED INDICATOR	1,300 800
	(DISSOLVED IN WATER) METHYL ORANGE INDICATOR (DISSOLVED IN WATER)	800
	O.1N SULFURIC ACID O.2N SULFURIC ACID	10,500 10,500
CALCIUM HARDNESS	0.5N SODIUM HYDROXIDE  CALCIUM HARDNESS INDICATOR  [1-(1-HYDROXYL-4-METHYL-2- PHENYLAZO)-2-NAPTHOL-4- SULFONIC ACID]	2,600 1,100 GRAMS
	EDTA STANDARD SOLUTION (ETHYLENDIAMINETETRAACETIC ACID, DISODIUM SALT)	10,500
TOTAL HARDNESS	HARDNESS BUFFER REAGENT (SODIUM SULFIDE)	600 GRAMS
	HARDNESS INDICATOR [1-(1-HYDROXY-2- NAPHTHYLAZO)-6-NITRO-2- NAPHTHOL-4-SULFONIC ACID] EDTA STANDARD SOLUTION (ETHYLENDIAMINETETRAACETIC ACID, DISODIUM SALT)	600 GRAMS
CHLORIDE	.171N SILVER NITRATE* POTASSIUM CHROMATE INDICATOR	2,100 600
pН	6.86 pH BUFFER SALT 7.00 pH BUFFER SOLUTION 4.00 pH BUFFER SOLUTION 9.18 pH BUFFER SALT 10.04 pH BUFFER SALT	11,000 3,000 3,000 52,000 5,000
PHOSPHATE	PHOS VER 3 (DISSOLVED IN ASCBORIC ACID)	600 GRAMS
SULFATE	SULFA VER 4 (BARIUM CHLORIDE)**	2,500 GRAMS
PHOSPHANATE	POTASSIUM PERSULFATE PHOS VER 3 (ASCORBIC ACID)	600 GRAMS 1,100 GRAMS

<sup>\*</sup> LISTED IN APPENDIX VIII: SILVER AND COMPOUNDS NOS \*\* LISTED IN APPENDIX VIII: BARIUM AND COMPOUNDS NOS

ANALYSIS	REAGENTS	VOLUME/YEAR (MLS)
TOTAL RESIDUAL CHLORINE	ACETATE BUFFER, 4 pH POTASSIUM IODIDE, 5% .00564N PHENYLARSINE OXIDE	55 55 20
FREE AVAILABLE CHLORINE	7.0 pH BUFFER .00564N PHENYLARSINE OXIDE	260 55
SILICA 1	SILICA 1 (AMMONIUM MOLYBDATE AND SULFURIC ACID)	2,500
	CITRIC ACID  AMINO ACID  (1-AMINO-2-NAPTHOL-4-SULFONIC  ACID IN SOLDIUM SULFITE AND  SODIUM META-BISULFITE)	2,500 GRAMS 2,500 GRAMS
COPPER	CU VER 1 [2,2'-BIQUINOLINE-4,4'- DICARBOXYLIC ACID (BICINCHONINIC ACID)] SODIUM POTASSIUM TARTRATE	800 GRAMS
ELIMINOX	SOLUTION #S0726	260
	(CARBOHYDRAZIDE) SOLUTION #SO191 (CARBOHYDRAZIDE)	27,000
	SOLUTION #SO192 (CARBOHYDRAZIDE)	150
	SOLUTION #SO193 (CARBOHYDRAZIDE)	260
WATER DISCHARGE	CONSISTING OF: DISH WASHING; BOTTLED CWTS, STORAGE TANK, BOILER AND COOLING TOWER SAMPLES; DEMINERALIZED WATER FOR RINSING.	4,000 GALLONS

### T. H. WHARTON

### INORGANIC IMPOUNDMENT

WASTE STREAM	CONSTITUENTS	APPROX. ANNUAL VOLUME (1983) (GALLONS)
INORGANIC METAL CLEANING WASTE	3-5% HCL SOLUTION RINSES RAINWATER POSSIBLY TRACE AMOUNTS OF THE FOLLOWING: CALCIUM IRON CHLORIDE COPPER SODIUM NICKEL SULFATE ZINC	0*
BOILER BLOWDOWN	MONO-,DI-,TRI-SODIUM PHOSPHATES AND NALCO "ELIMINOX" (FLASHES TO HYDRAZINE) ARE USED AS BOILER WATER ADDITIVES.  7/16/84 SAMPLE RESULTS INDICATE THE FOLLOWING (MG/L): CARBONATE <1 BICARBONATE 3.1 HYDROXIDE <1 CHLORIDE 4.5 SULFATE <1 SILICATE 0.59 PHOSPHATE 0.04 TOC 3 ZINC <0.005 LEAD <0.1 CHROMIUM <0.1 NICKEL <0.2 CALCIUM 1.46 MAGNESIUM 0.04 SODIUM <0.01 IRON 0.35	14,103,000
ACID/CAUSTIC DRAINS	MANGANESE < 0.01 COPPER < 0.01	UNKNOWN, VARIES
(CWTS-STORAGE TANKS)	H <sub>2</sub> SO <sub>4</sub> NaOH RAINWATER	WITH RAINFALL AND SPILLAGE

<sup>\*</sup> INORGANIC METAL CLEANING WASTE IS GENERATED INFREQUENTLY. QUANTITY GENERATED IN 1980 WAS APPROXIMATELY 284,000 GALLONS.

### ATTACHMENT A

"Part A Application Revisions"

### Revised Part A Application

Appropriate tables/pages (attached) of the Part A application have been revised to reflect current hazardous waste management practices at T. H. Wharton Generating Station.

The Part A application prepared in August 1980 listed several wastes/facility components which have been removed in the revised Part A. These wastes/components are discussed below:

1. Demineralizer Regenerant Inorganic Sludge

This sludge accumulates at the bottom of the demineralizer impoundment from storage of demineralizer regenerant. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 241470).

2. Metal Cleaning and Other Inorganic Sludge

This sludge accumulates at the bottom of the inorganic impoundment from storage of hydrochloric acid boiler and equipment cleanings, and boiler blowdown. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 241210).

3. Metal Cleaning Organic Acids/Metal Cleaning Organic Acids Collection Pond

This waste is generated from ammoniated citric acid or hydroxyacetic-formic acid boiler and equipment cleanings. It is stored in an impoundment prior to being injected in an energy-producing boiler for incineration. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 215290). The organic impoundment has, therefore, never received hazardous waste.

4. Metal Cleaning Organic Sludge

This sludge accumulates at the bottom of the organic impoundment. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 248990).

 Chemical Waste Treatment Sludge/Chemical Waste Treatment System & Sand Drying Beds

A concrete chemical waste treatment system is used to treat demineralizer regenerant, inorganic metal cleaning waste (when produced), and boiler blowdown prior to NPDES discharge. The sludge which accumulates in the settling chamber of the treatment system is pumped to sand drying beds for dewatering and periodic off-site disposal. Based on EP toxicity analyses submitted to your office on February 23, 1981 (letter attached), this sludge has been declassified to a Class II waste (TWC 240540).

6. Waste Oil and Sludge/Waste Oil and Sludge Collection Facility

Oily sludge generated from the oily waste treatment system is classified as a Class I nonhazardous or Class II waste, depending on the amount of oil present in the sludge. The attached EP toxicity analyses of oily sludge indicate that no hazardous constituents are present.

7. Asbestos in Insulation

Insulation containing asbestos is classified as a Class I nonhazardous waste (TWC 170750). Asbestos, originally listed on the Part A application, has been delisted from the hazardous waste list (CFR 40.261).

Table III-I Generated Hazardous Wastes and Management Activities

Estimated

						- Waste Manage	Waste Management Activities -		1983	318
Verhal	TDWB	TDWB	EPA	EPA		(Check app	(Check applicable items)		Quantity	Code
Description	Sequence	Waste Code	Hazard	Hazardous	Off-Site		On-Site	7	Generated	and
of Waste	Number	Number	Code	Waste No.	Disposal	Storage	Processing <sup>2</sup>	Disposal	(lbs)	Process
Demineralizer Acid and Base Regeneration Wastewater	007	902570	ပ	D002		×	X		4.66x108a	Water 4911 - Treatment
Inorganic Metal Cleaning Waste	010	903070	O	D002		×	X		0 <sub>p</sub>	4911 -
Spent Solvents	002	910100	I	0001	×	×	×		0.01×10 <sup>3</sup>	4911 - Degreasin
Paint Thinner	900	910110	I,I	D001 F003, E005	×	×			0	4911 - Painting
8	:	.			-					

a Total quantity discharged from demineralizer impoundment under NPDES permit.

b Inorganic metal cleaning waste is generated infrequently. Quantity generated in 1980 was approximately 2.37x106 lbs.

<sup>1 &</sup>quot;Storage" means the interim containment or control of waste after generation and prior to ultimate disposal.

waste nonhazardous, safer for transport, amenable for recovery, amenable for storage, or reduced volume. The "transfer" of solid "Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste so as to render such waste for reuse or disposal as used above, does not include the actions of a carrier in conveying or transporting solid waste by truck, ship, pipeline, or other means.

Verbal Description of Waste	Demineralizer Acid and Base Regeneration Wastewater
Process (see last column in Table III-I)	Water Treatment
TDWR Sequence Number of Waste (if assigned)	007, 008
Indicate the facility components used for st specified waste by entering the number of su is managed.	
Lagoon/Pond (unlined)	Landfarm
1 Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin_(concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
— Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	Other (specify
Landfill (other)	)

Verbal Description of Waste	Inorganic Metal Cleaning Waste
Process (see last column in Table III-I)	Boiler & Condenser Cleaning
TDWR Sequence Number of Waste (if assigned)	010
Indicate the facility components used for sto specified waste by entering the number of suc is managed.	0 , 0 ,
Lagoon/Pond (unlined)	Landfarm
1 Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin_(concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	Other (specify
Landfill (other)	)

Verbal Description of Waste	Spent Solvents
Process (see last column in Table III-I)	Degreasing
TDWR Sequence Number of Waste (if assigned)	005
Indicate the facility components used for sto specified waste by entering the number of suc is managed.	
Lagoon/Pond (unlined)	Landfarm
Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin_(concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	1 Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
1 Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	1 Other (specify Mixed with
Landfill (other)	waste oil for pickup by a
	waste oil recycling firm

Verbal Description of Waste	Paint Thinner
Process (see last column in Table III-I)	Painting
TDWR Sequence Number of Waste (if assigned)	006
Indicate the facility components used for sto specified waste by entering the number of suc is managed.	
Lagoon/Pond (unlined)	Landfarm
Lagoon/Pond (lined)	Landspreading Area
Basin (earthen, above-grade lined)	Spray Irrigation Area
Basin (earthen, above-grade unlined)	Flood Irrigation Area
Basin (earthen, below-grade lined)	Septic Tank/Drain Field
Basin (earthen, below-grade unlined)	Injection Well
Basin (concrete, above-grade lined)	Tank (surface storage)
Basin (concrete, above-grade unlined)	Tank (sub-surface storage)
Basin (concrete, below-grade lined)	Tank (surface processing)
Basin_(concrete, below-grade unlined)	Tank (sub-surface processing)
Basin (other)	Tank (other)
Pit (lined)	Drum Storage Area (open)
Pit (unlined)	1 Drum Storage Area (enclosed)
Incinerator	Drum Storage Area (other)
Open Controlled Incineration Area	Bulk Storage Area (open)
Boiler (energy-producing)	Bulk Storage Area (enclosed)
Landfill (sanitary)	Bulk Storage Area (other)
Landfill (surface, open)	Other (specify
Landfill (other)	)

# Table III-4 Hazardous Waste Facility Components List

Facility Component	Status		100	
Name	TDWR Seq. No. Inactive Active Proposed	(cu yds) (gal) (1bs)	اع و	in Service
Lagoon/Pond (lined)		1,000,000	10 (r	1974 1979- (relined)
Verbal Description: C	Clay lined pond for the collection of demineralize	demineralizer regeneration wastes prior to	treatment.	
£	Treated wastewater is discharged via NPDES permit.			
Lagoon/Pond (lined)		1,000,000	1 10 1979(r	19 - T)
Verbal Description: C	Clay lined pond for the collection of metal clear	collection of metal cleaning inorganic acid wastes from boiler and	ooiler and	
equipment cleaning oper	equipment cleaning operations prior to treatment. Treated wastewater	Treated wastewater is discharged via NPDES permit.		
Boiler (Energy-producing)	B) 03 X.	NA	NA	NA
Verbal Description: S	Spent solvents are mixed with waste oil prior to incineration in the boiler.	incineration in the boiler.		
Drum Storage Area		NA	4	1980
Verbal Description: D	Drum storage area for the collection of waste pai	collection of waste paint thinner and spent solvents prior to	rior to	9
0	off-site disposal.			) -
		100		! 
Verbal Description:				
Verbal Description:				
	N 10			

### Attachment G

### T. H. Wharton Generating Station

### Process Description for Hazardous Waste Streams

### 1. Demineralizer Acid and Base Regeneration Wastewater (EPA Hazard Code C)

Demineralizer regenerant waste is collected in the demineralizer impoundment. The waste is then pumped to the chemical waste treatment system for pH adjustment and suspended solids removal. Treated wastewater is discharged in accordance with the NPDES permit.

### 2. Inorganic Metal Cleaning Waste (EPA Hazard Code C)

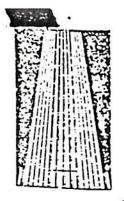
Inorganic metal cleaning waste is collected in the inorganic impoundment. The waste is then pumped to the chemical waste treatment system for pH adjustment, suspended solids and metals removal. Treated wastewater is discharged in accordance with the NPDES permit.

### Spent Solvents (EPA Hazard Code I)

Spent solvents are collected in drums, mixed with waste oil for recycling, or incinerated in an energy-producing boiler.

### 4 Paint Thinner (EPA Hazard Coed I, T)

Paint thinner waste is collected in drums. These drums are temporarily stored prior to off-site disposal.



### Houston Lighting & Power Company

Electric Tower P.O. Box 1700 Houston Texas 77001

April 8, 1981

Mr. Jay Snow
Solid Waste Section
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Snow:

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATIONS

Pursuant to requirements set forth under RCRA, we have analyzed representative samples of the various waste streams and sludges generated at Houston Lighting & Power Company's generating stations. These waste streams and sludges were reported as being hazardous on our Part A, TDWR Hazardous Waste Registrations solely on the basis of Extraction Procedure (EP) Toxicity with the exception of metal cleaning inorganic acid waste, which was also listed on the basis of corrosivity, and demineralizer regenerant, which was listed only on the basis of corrosivity (See Attachment I).

The attached tables summarize the EP toxicity test results performed on each sample, including samples of demineralizer regenerant. The analyses were performed by our contract laboratory, Southern Petroleum Laboratories, and were done in accordance with the extraction procedures outlined by the EPA in Part 261, Appendix II of the Hazardous Waste Regulations. An attachment (Attachment II) has also been provided which identifies various abbreviations used in the summary tables to aid in your review.

The EP toxicity analytical data does not indicate the presence of toxic components in concentrations greater than the EP toxicity test limits. Therefore, as a result of our testing, we feel that those wastes previously considered hazardous due to EP toxicity should be declassified from the hazardous waste category.

It was stated above that two waste streams, demineralizer regenerant and metal cleaning inorganic acid wastes were listed as hazardous on the basis of corrosivity. The individual components that comprise each of these two waste streams when analyzed separately could result in pH values outside the specified range of the classification system. For example, if grab samples were taken of the cation and anion deminerlizer regeneration wastes, the cation wastes could exhibit low pH values, and the anion wastes could exhibit high pH values.

Houston Lighting & Power Company

Mr. Jay Snow April 8, 1981

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATIONS

However, a composite sample of all the demineralizer regeneration wastes, due to neutralization of the wastes, would be classified as simply solid wastes since the pH would fall between 2 and 12.5. The same type of example can be applied to metal cleaning inorganic acid waste as well, whereby the composite pH of the waste product would not qualify it as hazardous.

With respect to the corrosion of metals test to determine if a waste exhibits characteristics of corrosivity, many of the samples collected for EP toxicity analysis, including demineralizer regenerant and metal cleaning inorganic acid waste, were subjected to this test. The corrosivity analyses were performed in accordance with the test method specified in NACE (National Association of Corrosion Engineers) Standard TM-01-69 as standardized in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods." All samples indicated corrosion rates of less than 1 millimeter per year. This is substantially less than the 6.35 millimeter per year standard specified in the regulations.

It is also important to note that demineralizer regenerant and metal cleaning inorganic acid wastes are chemically treated and discharged under NPDES and TDWR wastewater discharge permits.

Considering the characteristics of demineralizer regenerant and metal cleaning inorganic acid waste described above and the corrosivity data, we do not feel that these two types of waste should be classified as hazardous waste prior to their treatment.

We therefore request declassification of all wastes specified in Attachment I. If you concur with our evaluation please notify us so that we can revise our Hazardous Waste Management program accordingly.

Sincerely,

W. F. McGuire, Manager

Environmental Protection Department

RTB/dhj

Attachments -

I. Waste Listing

II. Data Table Key

III. EP Toxicity Data Tables (six)

IV. Analytical Reports

### ATTACHMENT I

### HOUSTON LIGHTING & POWER COMPANY

### WASTE LISTINGS

BASIS for LISTING AS HAZARDOUS
C
E
EC
E
E
E

C - Corrosive

E - E.P. Toxicity

### ATTACHMENT II

### HOUSTON LIGHTING & POWER COMPANY

### DATA TABLE KEY

PLANT NAME	PLANT ABBREVIATION	TDWR SOLID WASTE REGISTRATION NO.
S. R. BERTRON	SRB .	31637
CEDAR BAYOU	CBY	31639
H. O. CLARKE	HOC	31635
DEEPWATER	DWP	31632
GREENS BAYOU	GBY	31634
W. A. PARISH -	WAP	31631
P. H. ROBINSON	PHR	31638
WEBSTER	WEB	31633
T. H. WHARTON	THW	31636

For some of the waste sampled there exists more than one set of data. This is due to one of two reasons; 1) sample collections representing different dates; 2) sample collections representing more than one storage/treatment facility for that particular type of waste. These samples are denoted by their direction relative to one another (N,S,E,W) or by number notation.

### ATTACHMENT III

### EP TOXICITY DATA TABLES

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Houston Lighting & Power Company Hazardous Waste Management-Waste Analysis Demineralizer Regenerant (Liquid)

P Toxicity (ppm)	SRB	CBY	HOC	DWP (Eldeld)	GBY	WAP	PHR	WEB	THW.
.enic	<0.05	< 0.05	<0.05	<0.05 (N) <0.05 (S)	<0.05	<0.05	<0.05	<0.05 <0.05	<0.05
				<0.5		2 ×		3.7	
- Ium	<0.05	<0.05	<0.5	<0.5	<0.05	<8.1	1.3	<0.05	. 6.2
	1	•		c0.0>				0.00	
Jm f um	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	70 07
٠	÷			<0.05	*			60.0>	J.
·omfum	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	< 0.05	<0.0>
				<0.1	8			<0.1	
. pi	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	٠٥٠١
				<0.005				<0.005	
.cuny	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	< 0.005	*0.00
	8			<φ.02	*			<0.05	
entum	<0.02	<0.02	<0.02	<0.02	<0.02	<0.05.	<0.05	<0.02	<0.05
				< 0.05			•	< 0.05	
ver	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	< 0.05	<0.05
									ı
				<0.02				<0.02	)(
Jrin	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	< 0.02	< ~.05
		•		< 0.4				<0.4	934
ıdane	<0.4	< 0.4	<0.4	<0.4	<0.4	<0.4	< 0.4	< 0.4	< 0.4
		72		د٠]		1		∵'	
thoxychlor	∵	<1	دًا	<b>~</b>		Ţ	Ţ.		· ~
caphene	. 40.5	<0.5	<-0.5	<0.5 <0.5	<0.5	<0.5	<0.5	<0.5 < 0.5	<0.5
shlorophehoxyacetic	۲-	د)	. [>	<u>~</u> ~	حا	دا .	<1	~~	<b>~</b>
37				[ ]			•	[>	-

Houston Lighting & Power Company Hazardous Waste Management-Waste Analysis Demineralizer Regenerant (Sludge)

P Toxicity (nom)	SRB	. CBY	HOC	DWP	GBY	WAP	PHR	WEB	, THW.
					90		70.05	. 0.05	. 0.05
nic	40.9	0.1>		60.05	50.00				
	<1.7	< 2.0	3	28.5	1.1		4.0	<0.1	÷11.9
				•			,		
ıfum	6.0>	<1.0	200	<0.05	<0.05	-	·1.0	< 0.05	<0.05 
	<0.9	×1.0	əլ	<0.05	<0.05		<1.0	<0.05	(0)
	.1.7	<2.0.	deniet		*0.1		<2.0	.0.1	٠٥.٦
	<0.00	.0.01	donu 9	<0.005	<0.005	er .	<0.01	<0.005	<0.005
	<0.09	<1.0	dwes	, , ,0.05	<0.05	AN	<0.05	<0.05	<0.05
יסי	<0.09	٠١.٥	aβpn[s	<0.05	<0.05		. 0.1.	\$0.05	<0.05
						-			
rin	<0.02	<0.02	larke	.0.02	<0.02		<0.02 ·	<0.02	)(;
dane	,0,4	<0.04	o •0 •	<0.04	<0.4		*0.4	<0.4	<0.4
hoxychlor	, _	٦,	Н	: <ا	. [>		<b>ا</b>		∵.
aphene /	. 40.5	<0.5		<0.5	<0.5		<0.5	<0.5	<0.5
hlorophenoxyacetíc	~	. ا>		٠ [>	٦		⊽	<b>~</b>	<b>₽</b>
340 8 7									

Houston Lighting & Power Company Hazardous Waste Management-Waste Analysis Inorqanic Acid (Liquid)

8

Toutottu (nom)	SRB	CBY	Inorganic Acid HOC	cid (Liquid) DWP	GBY	WAP	PHR	WEB	THE .
andd) Garage	<0.05	:: *	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
	5,3		<0.1	<0.1	2.3	17.2	1.3	-0.1	. 3.6
min .	<0,05	i scid	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
mi į mc	<0.05	pinspr	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	
	.0.1	oni Ja	40.1°	<0.1	<0.10	<0.10	٠٥.1	٠٥٠١	٠٠٠١
Mills	<0.005	ent\er	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.00
	<0.05	ots to	<0.05	40.05	<0.05	<0.05	<0.05	<0.05	<0.05
ver	<0.05	u səop	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
		no A		3•€					<u>ن</u> (۶
rin	<0.02	(sa -	<0.02	<0.02	<0.02	<0.02	<0.02.	<0.02	0.5
dane	<0.4	sbəƏ	<0.4	<0.4	<0.4	<0.4	<0.4	<0.4	<0.4
hoxychlor	د) د	,	ا>	. 「>	دا .	د۱	دا	دا.	۵.
aphene	<0.5		<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
hlorophehoxyacetic	ام	i		<b>~</b>	[~		5	٦	~
	8				•		į.		E.

Houston Lighting & Power Company Hazardous Waste Management-Waste Analysis Inorganic Acid (Sludge)

Toutoite (mm)	SRB	CBY	HOC HOC	DWP	, GBY	WAP	PIłR	WEB	THM
(hdd) (a.c.)	-1.0	٠	0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
	16			28.5	2.4	-1>	2.0	٠٥.٦	10.7
mn.	<1.0			8	<0.05	0.05	<0.05	<0.05	-0 n5
mium	<1.0	bio	دا.0	, <0.05	<0.05	<0.05	<0.05	40.05	(3)
	<2.0	s oins	<2.0	<ا	-0.1	-0.1	9.1	۵.1	9.1
	-0.01	proni	- 10.0>	<0.005	<0.005	0.005	<0.005	<0.005	<0.005
cury	<1.0	Taent/	<0.05	٠ <sup>6</sup> .05	<0.05	0.05	<0.05	<0.05	<0.05
פחונויי	<1.0	arots 1	<1.0	<0.05	<0.05	0.05	<0.05	<0.05	<0.05
nin.	<0.02	ou səop	<0.02	<0.02	<0.02	0.02	<0.02	<0.02	) (
ıdane	40.4	Bayou	<0.4	4.0	40.4	0.4	4.0	40.4	4.0
hoxychlor	▽	Tebaə	▽			▽	٠ ا>	. ▷	⊽
kaphene /	4.5	P	4.5	40.5	40.5	<0.5	40.05	40.05	<0.05
chlorophenoxyacetic	⊽	•	V		-	- □	7		~
27					•			2 6	2 <b>I</b> C

Houston Lighting & Power Company Hazardous Waste Management-Waste Analysis Organic Acid (Liquid)

8

Toxicity (ppm)	SRB	CBY	HOC	DWP	GBY	MVP	PHR	WEB	- AET
1		<0.05m	10	12	1	<0.05(#2)		9	
. uic	<0.05	<0.05(8)		<0.05	<0.05 (S)	<0.05(#1)	<0.05	<0.05	<0.05
		42 42 60 F		5.0		11.5	<0.1	0.12	
- I		<0.05			<0.05	<0.05			
	<0.05	<0.05 <0.05		<0.05	<0.05	<0.05	<0,05	<0.05	9
		<0.05	8*		<0.05	2.89			λ.,
mi ju	<0.05	<0.05		<0.05	<0.05	3.75	<0.05	<0.05	<0.0>
		1.0>	er.		<٥.١	٠٥٠ ا			
	<0.1	<0.1	.bi	<0.1	<0.1	<0.1	<0.1	<0.10	¢0.1
		<0.005	90			<0.05			
· Auli	<0.005	<0.005 <0.005	o i u i	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
450		<0.05	e64	÷.•		<0.0>			
=	<0.02	40.05 40.05	, o ə.	<0.05	<0.05	<0.02	<0.05	<0.05	<0.05
		<0.05	tot		<0.05	<0.5	558		
	<0.05	<0.05 <0.05	s 1c	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
,			u		000	50			
		<0.02	sə		<0.02	<0.05			(
rin	<0.02	<0.02 <0.02	op a	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
		<0.4	υķ		<0.4	<0.4	,		*
dane	40.4	<0.4 <0.4	cla	<0.4	<0.4	<0.4	<0.4	<0.4	<0.4
		[ ]	.0	**	[>	<b>V</b> (			
hoxychlor	▽	√ <u>√</u>	•н	<1.0	· [>	دًا		< 1.0	~
		×0.5			<0.5	· • • • • • • • • • • • • • • • • • • •			
aphene	<0.5	<0.5		<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
			٠		<del>-</del>	<u></u>			3
hlorophehoxyacetic	- -			دًا.0	\$ T		<b>~</b>	-	<b>~</b>
P. (1)		<u>, , , , , , , , , , , , , , , , , , , </u>				<u>-</u>		-	

4-81

Houston Lighting & Power Company Hazardous Waste Management-Waste Analysis Organic Acid (Sludge)

P Toxicity (ppm)	SRB	CBY	100	DWP	GBY	MVP	PHR	WEB	THM
		< 1.0			< 0.05(N)	-			142
	<1.0	0.1.>		< 0.05	< 0.05(S)		< 0.05	< 0.05	< 0.05
	32.7	< 2.0 59		3.6	8.1 7.9		79.7	7.5	. 12.4
	×1.0	< 1.0 · ·	3	< 0.05	< 0.05		< 0.05	. 50.0>	× 0.0€
	< 1.0	<1.0 <1.0	.bio	< 0.05	< 0.05 < 0.05		0.28	< 0.05	),
	< 2.0 .	< 2.0 < 2.0	s Dins	< 0.1	< 0.1 < 0.1		.0.1	<0.1	< 0.1
	< 0.01	10.0 >	gro erc	< 0.005	< 0.005		< 0.005	< 0.005	< 0.0(
	<1.0	<0.1.0 <0.1.0	ots to	f < 0.05	< 0.05	A11	< 0.05	< 0.05	× 0.0
	<1.0	<1.0 <1.0	səop	< 0.05	< 0.05		< 0.05	< 0.05	0.0 >
	< 0.02	< 0.02 < 0.02	Clarke	< 0.02	< 0.02 < 0.02		< 0.02	< 0.02	
æ (8.	< 0.4	< 0.4 < 0.4	о .н	< 0.4	< 0.4 < 0.4		< 0.4	< 0.4	< 0.4
hoxychlor	۱>	ر . د د		「>				< J	\ \[ \tau \]
	< 0.5	< 0.5 < 0.5	in the second	<0.5	< 0.5 < 0.5		< 0.5	< 0.5	< 0.5
hlorophenoxyacetic	<1	ر د د	₹a	- [>	~~		[ v	١٠	7
		۲>			. ~		iii	¥	•



### Houston Lighting & Power Company

Electric Tower P.O. Box 1700 Houston, Texas 77001

February 23, 1981

Mr. Jay Snow
Solid Waste Section
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Snow:

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATION

MISCELLANEOUS INORGANIC SLUDGES

TDWR WASTE CODE NOS. 140540 and 240540

Pursuant to requirements set forth under RCRA, we have analyzed representative samples of inorganic sludge collected from sludge drying beds at stations where sludge drying beds exist. The sludge originates from chemical waste treatment systems associated with our power plants, and was reported as being hazardous on our Part A, TDWR Hazardous Waste permit applications on the basis of EP Toxicity. Presently on our TDWR Solid Waste Registrations this inorganic sludge is classified as either a Class I or Class II Solid Waste.

The attached table summarizes the EP toxicity test results performed on each sludge sample. The analysis was performed by our contract laboratory, Southern Petroleum Laboratories, and was done in accordance with the extraction procedures outlined by the EPA in Part 261, Appendix II of the Hazardous Waste Regulations. As a basis for comparison, column I of the table represents the test results of sludge from the cooling tower clarifier at our Greens Bayou Generating Station. This sludge has a Class III classification.

Based on the results identified in the table we believe that the inorganic sludge from our chemical waste treatment systems should be classified as Class III waste material as is the sludge from the cooling tower clarifier.

If you concur with this reclassification please notify us so that we can inform our personnel who handle this material.

Sincerely,

D. B. Chin

Principal Engineer, Water Quality Environmental Protection Department

RTB/dhj Attachment

COMPANY	Test Results
HOUSTON LIGHTING & POWER	Inorganic Sludge EP Toxicity Test Results
	-

	TDWR # 31634 Greens Bayou Cooling Tower Blowdown	HOUSTON LIGHT Inorganic Sludge E TDWR # 31639 Cedar Bayou	IGHTING & POWER COMPANY dge EP Toxicity Test Results 9 TDWR # 31632 TDWR Deepwater Webs	sults TDWR # 31633 Webster	TDWR # 31636 T.H.Wharton (South)	TDWR # 31636 T.H.Wharton (Nortf)
senic	. <0.05	<0,05	<0.05	<0.05	<0.05	<0.05
rium	<1.0	21	<1.0	-2.1	<1.0	<1.0
de fum	<0.02	<0.02	<0.02	<0.02	<0.02	<u> </u>
romium	<0.05	<0.05	<0.05	<0.05	<0.05	0,
þe	<0.10	<0.10	<0.10	<0.10	<0.10	<0.05
rcury	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
:lenium	. <0.02	<0.02	<0.02	. <0.02	<0.02	<0.02
lver	<0.05	<0.05	<0.05	<0.05	<0.0>	<0.05
ıdrin.	<0.02	<0.02	<0.02	<0.02	<0.02	, °°
Indane	<0.40	<0.40	<0.40	<0.40	<0.40	<0.40
thoxychlor	د1.0	۰۱.٥	<1.0	<1.0	<1.0	<1.0
ixaphene	<0.50	<0.50	<0.50	· <0.50	<0.50	<0.50
ichlorophenoxyacetic	<1.0	<1.0	<1.0	: <1.0	. <1.0	<1.0
	8	E1	4		•	· .



P.O. BOX 20807 HOUSTON, TX 77025 P.O. BOX 52768 LAFAYETTE, LA 70505 P.O. BOX 10276 JEFFERSON, LA 70181 P.O. BOX 378 ACME, MI 49610

Certificate Number 045710 Invoice Number 123528 April 01, 1982

Houston Lighting & Power Company Energy Development Complex Room C 275 P.O. Box 1700 Houston, Texas 77001

Attention: Mr. R. T. Bye

Sample Description: THW

tricellerator waste

API separator waste oil

Date Sampled: 03/03/82 Date Received: 03/18/82

					Date	Time		Analyst
	Trichlorophenoxypropionic		< 1.0	mg/l	03/31/82	8:00	am	JM
e 275.	Dichlorophenoxyacetic		< 1.0	mg/l	03/31/82	8:00	am	JM
	Silver total EPA storet number 01077		< 0.05	<u>mg/l</u>	03/24/82	3:00	pm	KES
	Arsenic total EPA storet number 01002		< 0.05	mg/l	03/26/82	8:00	am	KES
	Barium total EPA storet number 01007		< 0.1	mg/l	03/25/82	3:00	pm	KES
	Cadmium total EPA storet number 01027		< 0.05	mg/l	03/24/82	3:00	pm	KES
	Corrosivity		< 1	mmpy	03/19/82	4:00	pm	DD
	Chromium total EPA storet number 01034		< 0.05	<u>mg/l</u>	03/24/82	11:30	am	KES
	Endrin		< 0.02	mg/l	03/31/82	8:00	am	JM
	Flash Point	>	210	degF	03/22/82	8:00	am	SRG
	Mercury total EPA storet number 71900		< 0.005	mg/l	03/25/82	1:00	pm	KES

P.O. BOX 20807 HOUSTON, TX 77025 P.O. BOX 52768 LAFAYETTE, LA 70505 P.O. BOX 10276 JEFFERSON, LA 70181 P.O. BOX 378 ACME, MI 49610

Certificate Number 045710, page 2 Houston Lighting & Power Company

Lindane	< 0.4	<u>mg/1</u> 03/31/82	8:00 am	JM
Methoxychlor	< 1	<u>mg/1</u> 03/31/82	8:00 am	JDM
Lead total EPA storet number 01051	< 0.1	mg/1 03/24/82	10:00 am	KES
Selenium total EPA storet number 01147	< 0.05	mg/l 03/24/82	10:00 am	KES
Toxaphene	< 0.5	mg/1 03/31/82	8:00 am	JM

Quality Assurance: These analyses are performed in accordance with EPA quidelines for quality assurance. These procedures include the following as a minimum requirement: comparisons against known standards in each run, one in ten sample splits, and a quarterly method review against known spike samples.

SOUTHERN PETROLEUM LABORATORIES, INC.

142

REPORTS

FACILITY ID TXD 00083735/		
NEW ENTRY /	PERMIT NO _/_	
CHANGE ENTRY	ACTION CODE (2402= 0/	
DELETE ENTRY	SEQUENCE NO	
DATE DUE	STATUS CODE	;
ACTION DATE <u>84/04/</u> 0/		L
	FREE FIELD 1 _	• .
RESPONSIBLE AGENCY	FREE FIELD 2	
RESPONSIBLE PERSON Mas	FREE FIELD 3	* *
<u>.</u>	FREE FIELD 4	
	FREE FIELD 5	:
	FREE FIELD 6 /-15-85	
•		:
COMMENT TEXT (80 CHARACTERS M	MAXIMUM) :	H-
PERMIT ACTION LINKED TO PERMIT ACTION LINK CHANGED FR DELETE PERMIT ACTION LINK TO	то то	a <u>1</u>
PERMIT	ISSUANCE TRACKING	
FACILITY ID		· · ·
NEW ENTRY	PERMIT NO	(
CHANGE ENTRY	ACTION CODE	
DELETE ENTRY	SEQUENCE NO	•
DATE DUE	STATUS CODE	
ACTION DATE		8
	FREE FIELD 1 _	
RESPONSIBLE AGENCY _	FREE FIELD 2	<b>~</b> '
RESPONSIBLE PERSON	FREE FIELD 3	
	FREE FIELD 4	÷:
	FREE FIELD 5	< 0.0
•	FREE FIELD 6	
COMMENT TEXT (80 CHARACTERS MA	XIMUM) :	

PERMIT ACTION LINKED TO

### The Light company

Company Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

November 6, 1985

Mr. Minor Hibbs
Hazardous & Solid Waste Div.
Texas Water Commission
Post Office Box 13087
Capitol Station
Austin, Texas 78711

SUBJECT: CERTIFICATION OF CLOSURE (31 TAC, SECTION 335.216)

AFFIDAVIT OF EXCLUSION FROM HAZARDOUS WASTE PERMITTING

Greens Bayou Generating Station, TWC No. 31634

Dear Mr. Hibbs:

Certification is hereby made that the hazardous waste surface impoundment identified as facility number 02 on the Notice of Registration has been closed in accordance with the closure plan submitted by letters dated April 16, 1984, and August 8, 1984, and approved by the TWC on September 17, 1984. Enclosed is a certification of closure for this facility by an independent registered professional engineer.

Certification is also hereby made that the hazardous waste container storage area identified as facility number 06 on the Notice of Registration has been closed in accordance with the closure plan submitted on May 13, 1985, and approved by the TWC on September 23, 1985. Enclosed is a certification of closure for this facility by an independent registered professional engineer.

These closures constitute full facility closure of all hazardous waste units at Greens Bayou. Therefore, a signed and notarized Affidavit of Exclusion from Hazardous Waste Permitting is enclosed for your processing.

Class I hazardous wastes identified on the facility's current solid waste registration are handled as follows:

- a. <u>Paint thinner</u> drum storage onsite for less than 90 days; shipment offsite for disposal.
- b. <u>Mercury-contaminated waste</u> drum storage onsite for less than 90 days; shipment offsite for disposal.

Houston Lighting & Power Company

Mr. Minor Hibbs November 6, 1985 Page 2

- c. <u>Hydrazine</u> drum storage onsite for less than 90 days; shipment offsite for disposal.
- d. <u>Spent solvents</u> drum storage onsite for less than 90 days followed by shipment offsite for disposal; or, small amounts mixed with waste oil and sold to a recycler; or, incineration in the generating station's high-efficiency boiler.
- e. <u>Sandblast grit</u> container storage onsite for less than 90 days; shipment offsite for disposal.
- f. <u>Inorganic metal cleaning waste</u> when generated, the hazardous portion is routed to a separate compartment in a fiberglass-lined concrete tank prior to treatment and discharge as per NPDES permit requirements. The tank meets the RCRA permit exemption requirements as defined in 40 CFR 264.1.
- f. Demineralizer acid and base regenerant wastewater routed to a fiberglass-lined concrete tank prior to treatment and discharge as per NPDES permit requirements. The tank meets the RCRA permit exemption requirements as defined in 40 CFR 264.1.

If you have any questions regarding this matter, please contact Dr. R. D. Groover at 713/922-2195.

Sincerely,

W. F. McGuire

Manager, Environmental Protection Department

RDG/rmr Attachment

cc: Texas Water Commission, District 7 (Deer Park, Texas)

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### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1201 ELM STREET DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Houston Light and Power TH Wharton Genr Station P.O. Box 1700 Houston, TX 77001 ID #TXD000837351

RE: Request for Information Pursuant to §3007 of the Resource Conservation and Recovery Act, 42 U.S.C. §6927

Dear Sirs:

In August 1985, the Environmental Protection Agency (EPA) sent your company a letter to advise you that the Resource Conservation and Recovery Act of 1976 (RCRA) had been amended by the Hazardous and Solid Waste Amendments of 1984 (the Amendments), and in particular, to inform you of a new provision known as the loss of interim status provision. The purpose of this letter is to provide additional guidance relative to the loss of interim status provision and to request information regarding your operations before and after November 8, 1985.

The loss of interim status provision states:

- (2) In the case of each land disposal facility which has been granted interim status under this subsection before the date of enactment of the Hazardous and Solid Waste Amendments of 1984, interim status shall terminate on the date [November 8, 1985] twelve months after the date of the enactment [November 8, 1984] of such Amendments unless the owner or operator of such facility-
  - (A) applies for a final determination regarding the issuance of a permit under subsection (c) for such facility before the date twelve months after the date of the enactment of such Amendments; and
  - (B) certifies that such facility is in compliance with all applicable groundwater monitoring and financial responsibility requirements.

The EPA's interpretation of the requirement under this provision is published at 50 Federal Register 38946 (September 25, 1985), a copy of which is enclosed. Please read and follow this closely. In order for

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ATTACHMENT III

#### LOSS OF INTERIM STATUS REGION VI EPA RO6-01-06

1.	Reviewer:	DGS /SAF	• •				
2.	Facility name:	HOSTON LIC	INTIMO & PA	PILE	2 -	WHARTON GEN. STA	2.
3.	Address/location:	P.O. BOX 1	700				
		HOUSTON ,	TX. 7700	91			
4.	EPA I.D. No.:	TXD 000 P	37351				
5.	Type of RCRA units				TD	WR= 31636	
	requiring certific	ation: CLEANING ORGANIC	:				
X	A. S. T ACIDS CO	KALIZER REGENERAL	н.				
X							
	c		J			•S	
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	E		L				
	F		м				
	G		N				
	* Q.ZZ	8		Yes	No	Not Determined	
6.	Is groundwater cer required? If yes, Question 7. If no 22.	continue to			Ø		
7.	Is financial assurtion required? If to Question 8. If Question 22.	yes, continue			Ø		

			Yes	Ио	Not Determined
8.	Was groundwater certification submitted? If yes, continue to Question 9. If no, answer Questions 9, 10, 11, and 12, and go to Question 20.	6 <b>.</b> 0			
9.	Was financial assurance certification submitted? If yes, continue to Question 10. If no, answer Questions 10, 11, and 12 and yo to Question 20.				
10.	Is signature adequate? If yes, continue to Question 11. If no, answer Questions 11 and 12 and go to Question 22.				
11.	a. Part A Submittal - Date: 11/18/80 b. Part 3 Submittal - Date: 11/18/80 c. Topographic Map - d. Section 3007 Response - Date: 9/84 f. Post-Closure Plan - Date: 9/84 f. Post-Closure Plan - Date: 11/16/85 b. Other - Date: 11/16/85 h. Other - Date: Date: 11/16/85 ii. Date: 11/16/85 iv. Date: Da	·-	M D M D M D M D M D M D M D M D M D M D		
12.	Do all documents listed in Question 11 agree with the information shown in Question 5? If yes, continue to Question 13. If no, go to Question 22 and check with Project Manager before continuing with questionnaire.				
13.	Does groundwater certification properly address all units listed in Question 5? If yes, continue to Question 14. If no, go to Question 22.				

		8	Yes	No	Not Determin	ned
14.	Does financial assurance certification (insurance and closure/post-closure) properly address all units listed in Question 5? If yes, continue to Question 15. If no, go to Question 22.		Ø Q. 3	_ 2 Z	_	
15.	Does insurance address both sudden and non-sudden occurrences? If yes, continue to Question 16. If no, go to Question 22.		Ø			Ausilable
16.	Which of the following options were used to demonstrate financial assurance for closure? Note: check yes for the appropriate method - it is not necessary to check No for those which do not apply.	Closure			-+ B	
	<ul> <li>a. Closure trust fund:</li> <li>b. Surety bond guaranteeing payment into a closure trust fund:</li> <li>c. Surety bond guaranteeing performance:</li> <li>d. Closure letter of credit:</li> <li>e. Closure insurance:</li> <li>f. Financial test/corporate</li> </ul>					
	<pre>guarantee: g. Multiple financial mechanisms:</pre>					A 1-11-
17.	Which of the following options were used to demonstrate financial assurance for post-closure? Note: Check yes for the appropriate method - it is not necessary to check no for those which do not apply.	Post Clos Cost	. UPE 		+ B	Available

			Yes	No	Not Determined
	a.	Post-closure trust fund:			
	b.	Surety bond guaranteeing payment into a post-closure trust fund:			
	С.				
	d.	Post-closure letter of credit:			
		Insurance:			
	f.	Financial test/corporate			
	g.	<pre>guarantee: Multiple financial mechanisms:</pre>			
18.	Is/	certification considered plete? If no, explain in stion 22.			
19.	com	financial assurance considered plete? If no, explain in stion 22.			
20.	18, pla to	the answer to Questions 8, 9, or 19 is no, was a closure n submitted? If yes, continue Question 21. If no, go to stion 22.			
21.	18,	the answer to Questions 8, 9, or 19 is no, was a post- sure plan submitted?			
22.		efly discuss the problems or discrepancies i ermine if they are of a nature which prevent			
		These units have been closed &	cort	Fire	16,0
	R	Printered P.E.			
	_7	WDR certified firerial assurance &	sudo	len 1.	non-sudden
		supre on 4/23/85.			

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(S04) St	URFACE IMPOUNDMENTS	-		-
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(D83) St	URFACE IMPOUNDMENTS	-		-
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(SO3) WASTE PILES	-		=
(SO4) SURFACE IMPOUNDMENTS	-		-
DISPOSAL			
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(D80) LANDFILLS	-		-
(D81) LAND APPLICATION	_		-
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#### ENVIRONMENTAL PROTECTION AGENCY

#### Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

GENERATOR'S NAME: Houston Lighting & Power Company - Wharton Generating Station

Date rec'd:

Rec'd by:

XV. GENERATOR'S EPA I.D. NO.

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XVI. WASTE MINIMIZATION (narrative description)

The majority of hazardous waste generated by volume at a generating station are treatable hazardous wastewaters that are treated at the facility where the waste is generated prior to discharge from an NPDES permitted outfall. Wastewaters are contained and/or treated in concrete tanks to avoid use of surface impoundments. Hazardous surface impoundments are being closed, under state-approved closure plans, as expeditiously as possible and replaced by concrete tanks.

The remaining hazardous wastes generated at a generating station are from routine maintenance activities or planned construction. The following waste minimization practices have been implemented with respect to wastes generated from these types of activities:

- Hazardous materials used in maintenance and operations at HL&P facilities are ordered in quantities anticipated such as to be completely used within the expected shelf life. Containers of hazardous materials are used until empty. Any excess products are used elsewhere or returned to the manufacturer for credit as appropriate. Disposal as a hazardous waste is the final alternative.
- Hazardous materials which must be used, are used only in quantities necessary to accomplish the required objectives.
- Nonhazardous materials are substituted for hazardous materials whenever the substitute material can accomplish the same or similar objective productively.
- Materials are recycled or reused to the extent practical.
- Waste materials are segregated to avoid nonhazardous waste being mixed with hazardous wastes.
- Extensive sampling of waste is conducted to verify waste classifications which, in many cases, result in nonhazardous designations.

Waste generated, particularly wastewater, is a function of how much and to what extent the facility is generating electricity and a function of the types and extent of maintenance activities that are required at a particular facility. Therefore, comparisons of the volumes of waste actually generated in 1985 with previous years is not a meaningful indicator of the foregoing waste minimization practices.

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						CALLED PERMIT TYPE: UNDETERMINED PART B PERMIT TYPE: STORE/TREAT COVERED PERMIT TYPE: UNDETERMINED
P33 01	PERMIT APPLICN WITHDRWL REGSTED		04/01/84	ĮT.	S	NON REGULATED UNITS.
p39 01	PERMIT APPLIC WITHBRWL REG DET.		12/11/84	AR	25	CERTIFICATED CLOSHRE

O	86/06/05		REPORT				
	HOUSTON PWR & LIGHT TH WHARTON GEN STA. 16301 W MONTGOMERY HOUSTON TX 77064		TXD000837351 C305 FAC			TYPE D COUNTY: HARRIS	5 B C C C C C C C C C C C C C C C C C C
C11	119-FACILITY STATUS: EXISTING FACILITY NOTIFICATION DATE: 08/18/80 PROC CODES: TO2 S01 T01 S04 S02	C1105-PERMIT PART A RECEIF	STATUS: 7: 11/19 15: X	INTERIM 7/80	STATUS TS FA	US TSD EXISTENCE DATE: 07/01/58 FACILITY TYPE (BY C1801):DISPUSAL	
ACT SEQ NO NO	ACTION ITEM	DUE	ACTION S DATE	STATUS R	RESPAGCY	COMMENTS	
PRUCESS (R)S04	CLOSURE HEADER NO 01 CODES/AMOUNT/UNITS: (R=REQUES 6000000,000G (R)TO2	C2003-HEADER PROCESS TED; S=SUBMITTED; C=(24000,0000 (S)S04	CESS TYPE: D ; C=COVERED) 04 6000000	0,000	(S)T02	.2 24000,000U	
						CALLED PERMIT TYPE; DISPOSAL PART B PERMIT TYPE; DISPOSAL COVERED PERMIT TYPE; UNDETERMINED	
C03 01	CLOSURE PLAN SUBMITTED	8	04/16/84	63	va.		
C06 01	PUBLIC NOTICE OF CLOSURE PLAN		06/02/84	02	S		
C10 01	FINAL CLOSURE PLAN APPROVED		09/11/84	0)	S		
C12 01	CLOSURE CERTIFICATION RECEIVED		12/11/84	S	,,,		
C15 01	DATE INSPECTED TO CONFIRM CLOSRE		10/21/85	S	10		
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	82	09723785		FINAL CLOSURE PLAN APPROVED
	S	08/16/85		PUBLIC NOTICE OF CLOSURE PLAN
ADDITIONAL CLOSURE PLAN,	S	05/13/85		CLOSURE PLAN SUBMITTED
CALLED PERMIT TYPE: UNDETERMINED PART B PERMIT TYPE: STORE/TREAT COVERED PERMIT TYPE: UNDETERMINED				
		CESS TYPE: S ; C=COVERED)	C2003-HEADER PROCESS TYPE: TED; S-SUBMITTED; C-COVERE	CLOSURE HEADER NO 02 PROCESS CODES/AMOUNT/UNITS: (R=REQUESTED; (S)501 1801,000G
COMMENTS	AGCY	ACTION STATUS DATE CODE	DATE	SEQ NO ACTION ITEM
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	S	10/21/85		DATE INSPECTED TO CONFIRM CLOSRE
	S	12/11/84		CLOSURE CERTIFICATION RECEIVED
	S	09/17/84		FINAL CLOSURE PLAN APPROVED
	S	06/02/84		PUBLIC NOTICE OF CLOSURE PLAN
	ß	04/16/84	72	CLOSURE PLAN SUBMITTED
CALLED PERMIT TYPE: DISPOSAL PART B PERMIT TYPE: DISPOSAL COVERED PERMIT TYPE: UNDETERMINED				
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0/98	05/12		STATUS				PAGE 618
	LCHT&PWR-TH WHARTON MONTGOMERY	STA	TXD000837351				
		2	SOSPAJI	) (S/	COUNTY: HARRIS	97105 Jase	5-07-X
	FACILITY STATUS: EXISTING FACILITY NOTIFICATION DATE: 08/18/80 PROC CODES: TO2 S01 T01 S04 S02	PERMIT PART A	STATUS: INTERIM STATUS RECEIPT: 11/19/80 TRANS: X	1 1	TSD EXISTERCE DATE: 07/ FACILITY TYPE: DISPOSAL	07/01/58 SAL	4
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C06 01	PUBLIC NOTICE OF CLOSURE PLAN		06/02/84				
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Additional Closure PLAN

## DATA CHANGES



	EPA IDENTIFICATION NUMBER/C101=12	TWC #/C116=6	DDCDADCD	7 4 1 1
7			FREFAKEK	1-22-88
	Name/C104=40		¥	1 00 00
	Mailing Address/C106=30			County/C114=
	City/C107=25		\$1/01	C108=2 Zip/C109=5
	active contact Person/C105=30			Ownership Code/C10
	Location Address/C110=30			ST Dist/C115=2
				$\dashv$
	City/C111=25		ST/C2=	=2 Zip/C112=5
	Owner's Name/C1503=40			
20	GEN TRN TSD UIC C1105 C305	Other Other	Telep	elephone/C113=10
		c 119 = 1		
	waste codes to be added/C2701	Waste Codes	es to be deleted/C2701	
	Process Codes- Add - Delete - Change			
	C1802=13	C1803=	1 C1804=1	
	C1801=3	C1803=	1 C1804=1	
	C1801=3 C1802=13	C1803=	$\frac{1}{0.004}$	
	Other Coding as necessary			
	Entered by: R.V.	Date Entered: 2.4-88	QC:	File Code: IT. 1, B
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IHW020

\*\*\* TEXAS NATURAL RESOURCE CONSERVATION COMMISSION Notice of Registration Industrial and Hazardous Waste

07/15/97 Page: Date:

This registration does not constitute authorization of any waste management activities or facilites listed below. The registration reflects hazardous and/or industrial waste generation and management activities for which the registrant has provided notification. Requirements for solid waste management are provided by Texas Administrative code section 335 of the rules of the Texas Natural Resource Conservation Commission (TNRCC). Changes or additions to waste management methods referred to in this notice require written notification to the TNRCC.

Solid Waste Registration Numbe<mark>r: 31636 EPA Id: TXD000837351</mark>

Please refer to tha The Solid Waste Registration Number provides access to computerized and filed information pertaining to your operation. number in any correspondence.

Change Company Name to: Houston Lighting & Power; The Light Company-T.H. Wharton E.G.S. 16301 (State Hyw. 249) Houston, TX Bye, R. T. (Change Commany Name 1 Company Name: Site Name: Site Location: Contact:

Harris 2<sub>1</sub>0 Region: County:

Title:

Initial Registration Date: Last Amendment Date: Date NOR Computer update: Phone: 713-945-8201

Last

**Houston Industries Incorporated** P.O. Box 1700 Houston, TX 77251-1700 Mailing Address:

Reporting Method: 16301 State Hyw. Houston, TX 77064

Large Quantity Generator Hazardous Waste Generation Status:

Site Street Address:

4911 Electric Services Primary SIC Code: Handler Status:

Active Generator Industrial

Registration Status: Registration Type: Generator Type:

Change Operator Name to: -Houcton-Lighting-& Power-Co. Operator Information Name:

Houston Industries Power Generation

Phone: Address: Name:

Owner Information

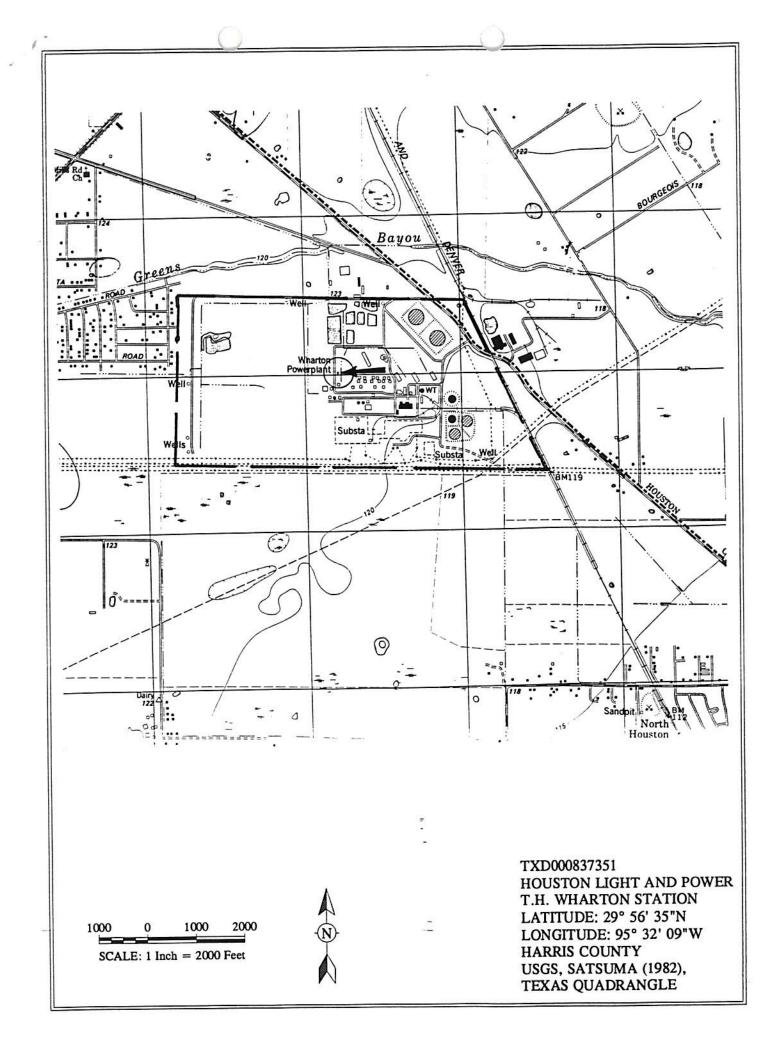
06/24/1997 - the next unassigned sequence number for WASTES is 0414 and the next unassigned sequence number for UNITS is 014. of

P.O. Box 1700 Houston, TX, 77251

Address:

Section 335, Chapter 31 of the Texas Adminstrative Code specifies the notification, record keeping, manifesting and reporting requirements for hazardous and industrial solid wastes.

IN RCK15 W. Montgonery This facility has been modified in the Resource Conservation and Recovery Information System (RCRIS) to a Large Quantity Generator (LQG). This modification to RCRIS was done April 29, 1995 per the instruction of the State of Texas (TNRCC). The LQG modification was based on responses TNRCC received to letters regarding their annual report. Due to the response received from this company, they have been coded as a LQG. All supporting documentation can be found in TNRCC's central records.



WF MCGUIRE MGR AV EGSI HLEP WHARTUN PLANT PU BUX 1700 HOUSTUN , TX 77001

> RE: EPA ID NUMBER TXD000837351 SEC ID NUMBER 031636 16301 W MONTGOMERY HOUSTON ,TX 77064

DEAR WE MCGUIRE :

## ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY (VERIFICATION)

THIS IS TO ACKNOWLEDGE THAT YOU HAVE FILED A NOTIFICATION OF REGULATED WASTE ACTIVITY FOR THE INSTALLATION LOACTED AT THE ADDRESS LISTED ABOVE TO COMPLY WITH SECTION 3010 OF THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA). YOUR EPA IDENTIFICATION NUMBER FOR THAT INSTALLATION APPEARS JUST ABOVE THE LOCATION ADDRESS. THE EPA IDENTIFICATION NUMBER MUST BE INCLUDED ON ALL SHIPPING MANIFESTS FOR TRANSPORTING HAZARDOUS WASTES; ON ALL ANNUAL REPORTS THAT GENERATORS OF HAZARDOUS WASTE, AND OWNERS AND OPERATORS OF HAZARDOUS WASTE, STURAGE AND DISPUSAL FACILITIES MUST FILE WITH EPA, ON ALL APPLICATIONS FOR A FEDERAL HAZARDOUS WASTE PERMIT; AND OTHER HAZARDOUS WASTE MANAGEMENT REPORTS AND DOCUMENTS REQUIRED UNDER SUBTITLE C OF RCRA.

for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



# Regulated Was e Activity United States Environmental Protection Agency

(For Official Use Only)

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VIII. Type of Regulated Waste Activity	(Mark 'X' in the appropriate boxe	s. Refer to I	nstructions.)	
A. Hazardou	s Wasts Activity		B. Used Oil Fuel Activities	
1. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lbs b. 100 to 1000 kg/mo (220 - 2,200 lbs c. Less than 100 kg/mo (220 lbs)  2. Transporter (Indicate Mode in boxes 1 a. For own waste only b. For commercial purposes  Mode of Transportation  1. Air 2. Rail 3. Highway 4. Water 5. Other - specify	4. Hazardous Waste Fuel a Generator Marketing	tor ns. to Burner tice(s) - Device r	1. Off-Specification Used Oil a. Generator Marketing to b. Other Marketer c. Burner - Indicate device Type of Combustion D. 1. Utility Boiler 2. Industrial Boiler 3. Industrial Furnace (or On-site Burner) Who Fire Oil Meets the Specification	Burner  a(s) -  evice  Marketer  rst Claims
IX. Description of Regulated Wastes (	Use additional sheets if necessary			
### Wastes your Installation handles. (See 40 CFR (D001) (D002) (D003)	4. Toxicity Characteristic (D000)  261.31 - 33. See instructions if you nee  3 4 10 11 11 12 14 15 16 16 17 17 18 18 19 10 10 10 10 10 10 10 10 10 10 10 10 10	Characterist  d to list more	s 6 1 1 1 12 12 1 1 12 1 1 1 12 1 1 1 1 1	n this
obtaining the information, I believe that there are significant penalties imprisonment.  Sonature  Stan W. Golio	that the submitted information	is true, accion, includ	ling the possibility of fines  Date Signed	ware
3. Comments		A6.		i.
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Note: Mall completed form to the appropria	re EPA Regional or State Office. (See	Section III et	the booklet for addresses.)	